

# **EXHIBIT V**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

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LEAGUE OF UNITED LATIN AMERICAN          Civil Action No.  
CITIZENS - RICHMOND REGION COUNCIL      1:18-cv-00423  
4614, et al.,  
                Plaintiffs,

v.

PUBLIC INTEREST LEGAL FOUNDATION,  
an Indiana Corporation, and  
J. CHRISTIAN ADAMS,  
                Defendants.

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VIDEOTAPED DEPOSITION OF J. CHRISTIAN ADAMS  
Washington, D.C.  
Monday, April 22, 2019

Job No. 158970

<div>Page 2</div> <div> 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 </div> <div> <p>Monday, April 22, 2019 9:11 a.m.</p> <p>The following is the transcript of the videotaped deposition of J. CHRISTIAN ADAMS held at the offices of Skadden, Arps, Slate, Meagher &amp; Flom LLP, 1440 New York Avenue, NW, Washington, DC 20005.</p> <p>Reported by: Linda S. Kinkade RDR CRR RMR RPR CSR Registered Diplmate Reporter, Nationally Certified Realtime Reporter, Registered Merit Reporter, Registered Professional Reporter, Certified Shorthand Reporter, in and for the State of California, Notary Public, within and for the District of Columbia</p> </div>	<div>Page 3</div> <div> 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 </div> <div> <p>APPEARANCES:</p> <p>Skadden, Arps, Slate, Meagher &amp; Flom On Behalf of Plaintiffs BY: Sean Tepe, Esq. BY: Nicole Cleminshaw, Esq. 1440 New York Avenue, NW Washington, DC 20005</p> <p>Foley &amp; Lardner On Behalf of Defendants BY: Michael Lockerby, Esq. BY: Eli Evans, Esq. 3000 K Street, NW Washington, DC 20007</p> <p>Also present: David Chroniger, Legal Video Specialist</p> </div>						
<div>Page 4</div> <div> 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 </div> <div> <p>INDEX OF EXAMINATION</p> <table> <tr> <td>EXAMINATION OF J. CHRISTIAN ADAMS</td> <td>PAGE</td> </tr> <tr> <td>BY MR. TEPE</td> <td>5</td> </tr> <tr> <td>BY MR. LOCKERBY</td> <td>--</td> </tr> </table> </div>	EXAMINATION OF J. CHRISTIAN ADAMS	PAGE	BY MR. TEPE	5	BY MR. LOCKERBY	--	<div>Page 5</div> <div> 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 </div> <div> <p>PROCEEDINGS</p> <p>VIDEO SPECIALIST: This is the start of tape labeled number 1 of the videotaped deposition of J. Christian Adams, in the matter League of the United Latin American Citizens v. Public Interest Foundation, et al., in the court, United States District Court, for the Eastern District of Virginia, case number 1:18-CV-000423.</p> <p>This deposition is being held at 1440 New York Avenue, northwest, Suite 1100, Washington, D.C., on April 21st, 2019 --</p> <p>THE REPORTER: 22nd.</p> <p>VIDEO SPECIALIST: -- 22nd, sorry -- at approximately 9:11. My name is David Chroniger from TSG Reporting, Inc., and I'm the legal video specialist. The court reporter is Linda Kinkade in association with TSG Reporting.</p> <p>Will counsel please introduce yourselves.</p> <p>MR. TEPE: Sean Tepe, pro bono counsel for Plaintiffs. I am joined by my colleague Nicole Cleminshaw.</p> <p>MR. LOCKERBY: Mike Lockerby with Foley &amp; Lardner LLP representing the Defendants.</p> <p>VIDEO SPECIALIST: Will the court reporter please swear in the witness.</p> </div>
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BY MR. LOCKERBY	--						

1 J. CHRISTIAN ADAMS,  
2 having been first duly sworn, was  
3 thereafter examined and testified as follows:

4 EXAMINATION

5 BY MR. TEPE:

6 Q. Good morning.

7 A. Good morning.

8 Q. Can you state your name for the record?

9 A. J. Christian Adams.

10 Q. You're under oath today, yes?

11 A. Yes.

12 Q. And is there any reason why you cannot  
13 give truthful and accurate testimony today?

14 A. Not that I'm aware of.

15 Q. Did you do anything to prepare for today's  
16 deposition?

17 A. Yes.

18 Q. What did you do?

19 A. Reviewed documents, talked to my  
20 attorneys.

21 Q. Did you talk to anyone else than your  
22 attorneys in preparation for today?

23 A. No.

24 MR. LOCKERBY: I just want to clarify  
25 something on the record. Today, of course, is

1 Mr. Adams' individual deposition. I know there were  
2 some issues on Friday, or Thursday rather, about the  
3 length of the 30(b)(6), and we would have no  
4 objection to Plaintiff's counsel completing the  
5 30(b)(6) in excess of seven hours as long as the  
6 aggregate number of hours for both didn't exceed 14  
7 hours.

8 MR. TEPE: I appreciate that. I think  
9 that would be fine, as long as we can just cover  
10 everything in the two days allotted, we should have  
11 no problem. All right. Thank you.

12 Q. Mr. Adams, in previous testimony you  
13 testified that you had multiple conversations with  
14 Mark Lytle of the United States Attorney's Office in  
15 the Eastern District of Virginia; is that correct?

16 MR. LOCKERBY: Object to the form.

17 MR. TEPE: What's the objection?

18 MR. LOCKERBY: Objection to the form.  
19 It's been asked and answered and misstates the  
20 witness's prior testimony.

21 MR. TEPE: Well, the witness can clarify.

22 Q. You did testify that you had multiple  
23 conversations with Mr. Lytle, correct?

24 A. I mean, if you have a transcript to show  
25 me, I wouldn't disagree with the fact that I had

1 multiple conversations. I would also point you back  
2 to my original testimony for any specifics.

3 Q. I understand, but let's just, you know,  
4 the simple question is you had multiple conversations  
5 with Mr. Lytle.

6 A. Again, my --

7 Q. Yes or no?

8 A. I did, and I believe I testified about  
9 that already.

10 Q. Okay. How many conversations did you  
11 have?

12 A. Don't remember.

13 Q. Were they all in person, these  
14 conversations?

15 A. No.

16 Q. Some were over the phone?

17 A. Possibly.

18 Q. Do you have any recollection of talking to  
19 him over the phone about -- and, again, we're talking  
20 about conversations that you had with Mr. Lytle with  
21 regard to the Alien Invasion reports.

22 A. Right. I have some recollection of that,  
23 but I can't be sure.

24 Q. Okay. So you recall at least, I think,  
25 two in-person meetings with Mr. Lytle?

1 A. Well, no, I said I recall two in-person  
2 conversations with Mr. Lytle. That's what you asked.

3 Q. Okay. So there's two in-person  
4 conversations and potentially some phone calls.

5 A. Well, at least. There may be more.

6 Q. More than --

7 A. Two.

8 Q. -- in-person conversations?

9 A. Right.

10 Q. Okay. So how many in-person  
11 conversations?

12 A. I don't know. I testified to that  
13 already.

14 Q. And then -- and so, in addition to  
15 potentially more than two in-person conversations,  
16 there may have been some phone conversations with  
17 Mr. Lytle with regard to the Alien Invasion reports?

18 A. I've already testified to that.

19 Q. That's a yes.

20 A. I did, I testified to that already. I  
21 gave you an answer.

22 Q. The answer is yes.

23 A. I don't know. I'd need to see what my  
24 previous answer was, but it's consistent with that.  
25 There may have been phone conversations, but I

<p style="text-align: right;">Page 10</p> <p>1 testified to that already.</p> <p>2 Q. Have you had conversations with other</p> <p>3 members of the Department of Justice with regard to</p> <p>4 the Alien Invasion reports?</p> <p>5 A. Probably, but I don't remember</p> <p>6 specifically those conversations.</p> <p>7 Q. If you had such conversations, who would</p> <p>8 they have been with?</p> <p>9 A. That's speculating. I don't know.</p> <p>10 Q. So it's your testimony today that you</p> <p>11 believe that you probably had conversations with</p> <p>12 members of the Justice Department, besides Mr. Lytle,</p> <p>13 with regard to the Alien Invasion reports, but you do</p> <p>14 not recall the specifics of those conversations.</p> <p>15 MR. LOCKERBY: Object to the form.</p> <p>16 Q. Is that true?</p> <p>17 A. I think I've already testified to that.</p> <p>18 Q. No. I'm trying to ask questions to</p> <p>19 establish what your testimony is. You cannot just go</p> <p>20 back and say I've already testified to it.</p> <p>21 MR. LOCKERBY: Objection, the transcript</p> <p>22 reflects what his testimony is. It's not proper to</p> <p>23 ask questions about what the transcript reflects.</p> <p>24 MR. TEPE: And I'm not trying to do that.</p> <p>25 What I'm trying to do is ask simple questions that</p>	<p style="text-align: right;">Page 11</p> <p>1 Mr. Adams seems not inclined to want to answer.</p> <p>2 Q. So, my question again, is it your</p> <p>3 testimony that you believe you probably had</p> <p>4 conversations with members of the Justice Department</p> <p>5 besides Mr. Lytle with regard to the Alien Invasion</p> <p>6 reports, but you do not recall the specifics of such</p> <p>7 conversations?</p> <p>8 A. That's correct.</p> <p>9 Q. What makes you say that you probably had</p> <p>10 such conversations?</p> <p>11 A. Because I would have been extremely</p> <p>12 enthusiastic about having the Justice Department</p> <p>13 finally enforce the law related to noncitizen</p> <p>14 registration and voting, and would have been highly</p> <p>15 inclined to have those conversations with members of</p> <p>16 the Justice Department, because the previous</p> <p>17 administration had failed to enforce the law, and,</p> <p>18 therefore, I would have had a motive to have those</p> <p>19 conversations. Can I remember the specific</p> <p>20 conversations? No.</p> <p>21 Q. Thank you. Have you had conversations</p> <p>22 with any other members of the federal law enforcement</p> <p>23 community other than members of the Justice</p> <p>24 Department and Mr. Lytle with regard to the Alien</p> <p>25 Invasion reports?</p>
<p style="text-align: right;">Page 12</p> <p>1 A. How do you define "federal law enforcement</p> <p>2 community"? How broadly?</p> <p>3 Q. As broad as possible. Federal employee,</p> <p>4 federal law enforcement.</p> <p>5 A. Well, that's a different question.</p> <p>6 Federal employee is different than federal law</p> <p>7 enforcement. So I'm asking, what is your question?</p> <p>8 How broadly do you find this -- do you define federal</p> <p>9 law enforcement?</p> <p>10 Q. Well, let's start the most broad as</p> <p>11 possible. Have you had conversations with federal</p> <p>12 employees regarding the Alien Invasion reports other</p> <p>13 than Mr. Lytle and probably other members of the</p> <p>14 Justice Department?</p> <p>15 A. Right, and I don't have a specific</p> <p>16 recollection of that.</p> <p>17 Q. Are you aware of any investigation by</p> <p>18 federal law enforcement into those listed in the</p> <p>19 Alien Invasion reports?</p> <p>20 A. One would not be made aware of such</p> <p>21 things.</p> <p>22 Q. That's not responsive to my question.</p> <p>23 Are you aware of any investigation by federal</p> <p>24 law enforcement into those listed in the Alien</p> <p>25 Invasion reports?</p>	<p style="text-align: right;">Page 13</p> <p>1 A. The federal investigative agencies do not</p> <p>2 make third parties aware of investigations.</p> <p>3 Q. Again, that is not responsive to my</p> <p>4 question. Are you, Mr. Adams, aware of any</p> <p>5 investigation by federal law enforcement into those</p> <p>6 listed in the Alien Invasion reports?</p> <p>7 A. Because federal law enforcement agencies</p> <p>8 do not make a practice of alerting the public,</p> <p>9 generally speaking, about the existence of</p> <p>10 investigations, I have not been made aware of any</p> <p>11 investigations.</p> <p>12 Q. So when you had conversations with</p> <p>13 Mr. Lytle, he did not give any indication as to what</p> <p>14 he would do with that information?</p> <p>15 A. That's not what I testified to. That's</p> <p>16 not accurate.</p> <p>17 Q. Okay. So Mr. Lytle did give you</p> <p>18 indications as to what he would do with the</p> <p>19 information.</p> <p>20 A. I already knew what he would do with the</p> <p>21 information by virtue of formerly working at the</p> <p>22 Justice Department. And the Justice Department has a</p> <p>23 very rigorous protocol for looking at evidence that</p> <p>24 third parties give to people at the Justice</p> <p>25 Department that includes preliminary reviews,</p>

<p style="text-align: right;">Page 14</p> <p>1 substantive reviews, requests for data from other 2 agencies. 3 And so I didn't need to have the conversation 4 with Mr. Lytle, because I knew that, when Mr. Lytle 5 was alerted to a problem like this, which is a 6 serious one, at least most people take seriously, and 7 I knew the attorney general took seriously, and I 8 knew the president took seriously, that Mr. Lytle 9 would do what I used to do at the Justice Department 10 when I was an attorney there and initiate a series of 11 steps that would take a look at the issue. 12 And so I didn't need to get feedback from 13 Mr. Lytle because I knew what you do when you're a 14 Justice Department lawyer. 15 Q. Did Mr. Lytle give you any indication as 16 to what he would do with the information, yes or no? 17 A. I answered that question. 18 Q. No. Did Mr. Lytle give you any indication 19 as to what he would do with that information? 20 A. I don't remember. 21 Q. With your enthusiasm for prosecution, you 22 would -- 23 A. That's not what I testified to. 24 Q. Excuse me, sir. 25 A. That's not what I testified to.</p>	<p style="text-align: right;">Page 15</p> <p>1 Q. Sir, sir, I have not finished my question. 2 A. Right. 3 Q. You testified earlier that you would have 4 been extremely enthusiastic about having the Justice 5 Department finally enforce the law. 6 Given that, you don't recall whether or not 7 Mr. Lytle gave you any indication of what he would do 8 with the information you provided? 9 MR. LOCKERBY: Object to the form of the 10 question. 11 A. Right. And I never said a word about 12 enthusiasm for prosecution in this deposition. What 13 I said was enthusiasm for enforcing the law. And 14 that comes in many forms, many of which you have 15 omitted in your question. 16 One could be to take action to clean up the 17 voter rolls, which is not prosecution. Another could 18 be taking a look at why Virginia is canceling 19 citizens or noncitizens from the rolls improperly. 20 Another could be a NVRA action, another could be a 21 prosecution. 22 So when I said enforce the law, I was talking 23 about a broad array of possibilities. If there was a 24 noncitizen on the voter rolls, then I would have had 25 enthusiasm for prosecution of that individual,</p>
<p style="text-align: right;">Page 16</p> <p>1 because they would have been violating multiple 2 federal felonies, and I don't think anybody would 3 disagree with that position, at least not seriously. 4 Q. So it is your testimony today that you 5 don't remember if Mr. Lytle gave you any indication 6 as to what he would do with the information that you 7 provided to him with regard to the Alien Invasion 8 reports? 9 MR. LOCKERBY: Object to the form. 10 A. I think I've already answered that 11 question. 12 Q. That's your testimony. 13 A. I think I testified to this. 14 Q. And that's -- 15 A. My testimony is what it was when I gave 16 it. 17 Q. The Public Interest Legal Foundation 18 promoted the Alien Invasion reports, correct? 19 MR. LOCKERBY: Object to the form. 20 A. The Public Interest Legal Foundation 21 promoted it ... I don't understand what you mean. 22 Q. Do you understand what the word 23 "promotion" means? 24 A. Promotion could mean a variety of things, 25 and in this context it particularly could mean a</p>	<p style="text-align: right;">Page 17</p> <p>1 variety of things. If you have a specific example of 2 promotion, I will answer that question. 3 Q. Why? You can't answer a general question 4 about PILF promoting the Alien Invasion reports? 5 MR. LOCKERBY: Object to the form. 6 A. Okay. PILF talked about the Alien 7 Invasion reports, correct. 8 Q. And they talked about the Alien Invasion 9 reports in multiple media formats, correct? 10 A. Multi -- "multiple media formats," do you 11 mean multiple media venues or media outlets? Is that 12 what you mean? I don't understand the question. 13 You're just using a term that isn't squared 14 with reality in the practice of broadcasting. 15 Q. PILF issued press releases with regard to 16 the Alien Invasion reports, correct? 17 A. Yes. 18 (Johnson Exhibit 22 19 previously marked for identification 20 and referenced herein: Email 21 correspondence from (topmost) S 22 Powell sent 10/4/2016 23 PILF-ADAMS-0013638 - 0013639) 24 Q. Handing the witness what has been 25 previously marked as Johnson Exhibit 22.</p>

<p style="text-align: right;">Page 18</p> <p>1 This is an example of one of those press 2 releases; is that right?</p> <p>3 A. Well, Johnson 22 is not an example of a 4 press release. It's an example of an email chain 5 between Shawna Powell and Noel Johnson on October 4th 6 that ultimately has a press release attached to it, 7 but Johnson 22 is not a press release.</p> <p>8 Q. At the bottom of Johnson 22, on Tuesday, 9 October 4th, there is a press release that was sent 10 by PILF to media; is that right?</p> <p>11 A. Right, but the entire exhibit is not a 12 press release.</p> <p>13 Q. You can put that aside.</p> <p>14 (Adams Exhibit 1 marked for 15 identification: Email correspondence 16 from (topmost) N Johnson sent 17 5/24/2017 18 PILF_ADAMS-0000821 - 0000823)</p> <p>19 Q. The court reporter has marked as Exhibit 20 52 -- I'm sorry, Exhibit 1 -- a document with the 21 Bates number 822.</p> <p>22 Do you recognize that document, sir?</p> <p>23 MR. LOCKERBY: I'm sorry. Where is this 24 document?</p> <p>25 A. I see this document.</p>	<p style="text-align: right;">Page 19</p> <p>1 Q. All right. So there's an email from Logan 2 Churchwell to you and Mr. Johnson, May 24th, 2017, 3 right?</p> <p>4 A. No -- oh, right. It's -- I can read that.</p> <p>5 Q. And then Mr. Johnson responds to you and 6 Mr. Churchwell saying, "Looks great. A few small 7 things. Is the plan to go public on Monday, the 8 29th, as indicated in the release?" Do you see that?</p> <p>9 A. I can read that.</p> <p>10 Q. Okay. And then attached to it is a press 11 release on Alien Invasion II; is that correct?</p> <p>12 A. No, that's not correct.</p> <p>13 Q. Okay. So at the top of this draft it 14 says, "for immediate release." Do you see that, the 15 attachment?</p> <p>16 A. Well, but that's what every press release 17 says. That's a draft. That's --</p> <p>18 Q. It's a draft press release.</p> <p>19 A. Right.</p> <p>20 Q. Yes.</p> <p>21 A. It's a draft press release.</p> <p>22 Q. Yes. Right. So this is a draft press 23 release for Alien Invasion II.</p> <p>24 A. Correct.</p> <p>25 Q. Yes. And on the title of the draft press</p>
<p style="text-align: right;">Page 20</p> <p>1 release it says, "Report: 5,500 plus noncitizens 2 discovered on voter rolls in Virginia," right?</p> <p>3 A. It says that.</p> <p>4 Q. Right. And then underneath the subheader 5 says, "one-third of noncitizens found voted 6 illegally." Do you see that?</p> <p>7 A. It says that.</p> <p>8 Q. Okay. And so to promote the Alien 9 Invasion reports, PILF issued press releases.</p> <p>10 A. I've answered that. I'll answer it again. 11 We issued press releases.</p> <p>12 Q. And PILF also tweeted about the reports, 13 correct?</p> <p>14 A. I don't know.</p> <p>15 Q. Mr. Adams, you're a very --</p> <p>16 A. I don't know.</p> <p>17 Q. You're very prolific on Twitter, aren't 18 you?</p> <p>19 MR. LOCKERBY: Object to the form.</p> <p>20 Q. Would you -- wouldn't you say you're very 21 prolific on Twitter?</p> <p>22 A. No.</p> <p>23 Q. No? Okay.</p> <p>24 A. Certainly not.</p> <p>25 Q. You do tweet, though, right?</p>	<p style="text-align: right;">Page 21</p> <p>1 A. That's -- a difference between prolific.</p> <p>2 Q. Well, I don't know. I thought maybe you'd 3 consider yourself prolific. But you do tweet, right?</p> <p>4 A. I've answered that.</p> <p>5 Q. And PILF tweets as well, right?</p> <p>6 A. I think so. I don't see all their tweets.</p> <p>7 Q. Well, you don't need to see all their 8 tweets to know whether or not they do in fact tweet.</p> <p>9 A. They do tweet.</p> <p>10 (Adams Exhibit 2 marked for 11 identification: Twitter feed of the 12 Public Interest Legal Foundation)</p> <p>13 Q. The court reporter has marked as Adams 2 a 14 document.</p> <p>15 Do you recognize that?</p> <p>16 A. It appears to look like a Twitter feed.</p> <p>17 Q. A Twitter feed of the Public Interest 18 Legal Foundation, right?</p> <p>19 A. Right.</p> <p>20 Q. And there are a few tweets represented in 21 this exhibit?</p> <p>22 A. There are.</p> <p>23 Q. At the bottom there's one from PILF dated 24 September 29th?</p> <p>25 A. I'm sorry?</p>

1 Q. I'm sorry. At the bottom there's one from  
2 PILF dated September 29th of 2016?

3 A. I can read that.

4 Q. Yes. And it says, "hundreds of  
5 noncitizens on voting rolls in swing state of  
6 Virginia."

7 A. It says that.

8 Q. Right. And then there's another tweet,  
9 "We have uncovered one thousand plus noncitizens  
10 registered to vote in the swing state of Virginia,"  
11 right? Do you see that?

12 A. It says that.

13 Q. And that was on October 3rd of 2016.

14 A. It says that.

15 Q. Okay. So PILF did tweet about the Alien  
16 Invasion I report, correct?

17 A. At the time I didn't have any knowledge of  
18 this necessarily. I don't remember, but it's -- it  
19 appears from Exhibit 2 that they were tweeting about  
20 the Alien Invasion report. I'm sorry. It appears  
21 they were tweeting about the Alien Invasion report.

22 (Adams Exhibit 3 marked for  
23 identification: Twitter feed from  
24 the Public Interest Legal  
25 Foundation)

1 Q. The court reporter has handed you, sir,  
2 what's been marked as Adams 3. Do you recognize this  
3 document?

4 A. I've never seen it before, but it appears  
5 to be a Twitter, a portion of a Twitter feed from the  
6 Public Interest Legal Foundation. There's a Twitter  
7 logo on it, so that is probably what it is.

8 Q. Yes, it's a copy of PILF's Twitter feed  
9 from May 30th of 2017; is that correct?

10 A. That's what it says.

11 Q. And at the bottom of the first page, what  
12 would be the first tweet in a series of tweets that  
13 day, it shows that PILF tweeted, "Virginia election  
14 officials quietly remove 5,556 voters for  
15 noncitizenship between 2011 and May of 2017." Do you  
16 see that?

17 A. I see that.

18 Q. Right. And there's a link there provided  
19 to PILF's website, right?

20 A. It appears that there is a link.

21 Q. And so there's a series of tweets that  
22 day, would you agree, with regard to the Alien  
23 Invasion II report?

24 A. It appears to say that.

25 Q. You can put that aside.

1 A. Pardon?

2 Q. You can put that aside. Thank you.

3 PILF also posted on the Facebook page of PILF  
4 with regard to the Alien Invasion reports, correct?

5 A. I don't have any idea. I didn't even -- I  
6 never saw that.

7 (Adams Exhibit 4 marked for  
8 identification: Screenshot of PILF's  
9 Facebook page)

10 Q. The court reporter has marked as Exhibit 4  
11 a document. Do you recognize that?

12 A. I'm holding Exhibit 4.

13 Q. And it appears to be a screenshot of  
14 PILF's Facebook page, correct?

15 A. I don't know what Facebook looks like. I  
16 don't use Facebook.

17 Q. Okay. But you knew -- you do know that  
18 PILF has a Facebook page, correct?

19 A. No. I don't use Facebook. I testified to  
20 that.

21 Q. Well, you don't need to use Facebook to  
22 know how PILF, your organization, promotes its  
23 message, correct?

24 A. I don't understand the question. It's not  
25 my organization. I don't own it.

1 Q. You're the president of it.

2 A. Doesn't mean -- it's not my organization.

3 Q. As president of PILF, you want to distance  
4 yourself?

5 A. Not at all.

6 MR. LOCKERBY: Object to the form.

7 A. Your question was confusing. It's not my  
8 organization.

9 Q. Well, this image of the PILF Facebook page  
10 shows a posting on October 3rd, 2016, correct?

11 A. That's what it says.

12 Q. And this posting says, "We have uncovered  
13 one thousand plus noncitizens registered to vote in  
14 the swing state of Virginia."

15 A. I can read that.

16 Q. And then there's a link to a Breitbart  
17 story; is that right?

18 A. I can read that it says that.

19 Q. And PILF also promoted the Alien Invasion  
20 II report on its Facebook page, correct?

21 MR. LOCKERBY: Object to the form.

22 A. I don't know.

23 MR. TEPE: And what's the basis for the  
24 objection?

25 MR. LOCKERBY: Use of the word "promoted."



(Adams Exhibit 5 marked for identification: Screenshot of PILF's Facebook page May 30th, 2017)

Q. The court reporter has handed you what's been marked as Exhibit 5. It is a screenshot of PILF's Facebook page from May 30th, 2017, correct?

A. Well, I can see Exhibit 5.

Q. Do you have any reason to doubt that this is a screenshot of PILF's Facebook page from May 30th, 2017?

A. I don't dispute your representation that's what this is, but I have no way to know because I've never used Facebook in my life.

Q. Okay. But this screenshot does show a posting from PILF with regard to the release of Alien Invasion II; is that right?

A. I can read that it says that.

Q. And it says, "Report: 5,500 plus noncitizens discovered on voter rolls in Virginia," correct?

A. I can read that it says that on Exhibit 5.

Q. For the Alien Invasion reports, PILF also secured coverage in various print and online media; is that right?

A. Well, I can't speak about PILF, but I can

speak personally, and the answer is yes.

Q. And why can't you, as president of PILF, speak about PILF?

A. Well, because I don't have any recollection of specific instances for PILF, but I have specific recollections for me.

(Adams Exhibit 6 marked for identification: Email correspondence from (topmost) C Adams sent 10/3/2016 PILF-ADAMS-0044021)

Q. The court reporter has marked as Adams Exhibit 6 an email with the Bates 44021. Do you see that?

A. I see Exhibit 6.

Q. And you see that's an email from you dated October 3rd, 2016, correct?

A. It's what it says.

Q. And you did send this email, correct?

A. I have no reason to question that I did.

Q. It's to Ms. Phillips, Johnson -- Ms. Phillips, Mr. Johnson, Ms. Powell, and Mr. Vanderhulst, correct?

A. I can read that it says that.

Q. And the subject line is, "Important: Breitbart." Do you see that?

A. I see that.

Q. And there's a link to a Breitbart story that appears to be coverage of Alien Invasion I. Would you agree with that?

A. No, I wouldn't, because there's no content. It just is a link. If you have the -- is this two pages? No. If you have the story that it links to ...

Q. Oh, we'll get to that, sir.

A. Then show it to me, and I'll answer your question.

Q. And so my question is: Do you have any reason to doubt that this is a link sent by you to the Breitbart story covering the release of Alien Invasion I?

A. Yes. The reason I have the doubt is because I don't see the story.

Q. And so you see the link dated October 2nd, 2016, right? Do you see that in the link?

A. Where? Right, the link has 10-2.

Q. Yes, 2016/10/02, correct?

A. It says that.

Q. And then /Virginia-illegal-voting-fraud-coverup.

A. It says that.

Q. Right. And so do you have reason to doubt that this is a link to the Breitbart story with regard to Alien Invasion I?

A. Well, there's a lot of alien coverup issues, if you will, going on at this time. We weren't getting records. We had to sue places.

I mean, I appreciate your commentary for the record that you make. It's not on camera. But you are making commentary throughout this deposition, whether it's waving your hand at me or turning to co-counsel and sneering, but that's exactly what you're doing.

MR. LOCKERBY: And laughing and snickering too.

A. Right. And so to answer your question, there was lots of things going on that this could have involved, that, if you will show me the actual article that this links to, I will be happy to share my thoughts about it.

Q. Sir, I was just looking at my colleague just now and that was about it.

A. Sure. Is there a question?

Q. So in this email that you sent, why did you put, as the subject, "Important: Breitbart"?

A. I don't have a specific recollection of

<p style="text-align: right;">Page 30</p> <p>1 why I did that. Maybe -- I mean, I'm not going to 2 speculate.</p> <p>3 (Adams Exhibit 7 marked for 4 identification: Email correspondence 5 from (topmost) C Adams sent 6 10/3/2016 7 PILF-ADAMS-0006102 - 0006104)</p> <p>8 Q. The court reporter has marked as Exhibit 7 9 a document with Bates number 6102. Do you see that?</p> <p>10 A. I see Exhibit 7.</p> <p>11 Q. And do you recognize that to be an email 12 that you sent on October 3rd, 2016?</p> <p>13 A. It says that.</p> <p>14 Q. And so you did send this email, correct?</p> <p>15 A. Yeah, this came earlier. Exhibit 7 is 16 earlier than Exhibit 6. So you could have asked me 17 about Exhibit 7 right off the bat, and I would have 18 been happy to answer the question, because I offered 19 some of the explanation you were seeking in your 20 previous questions in this email.</p> <p>21 Q. Strike as not responsive. 22 So, Mr. Adams, you sent this email, correct?</p> <p>23 A. It's what it says.</p> <p>24 Q. That's not my question. My question is: 25 You sent this, correct?</p>	<p style="text-align: right;">Page 31</p> <p>1 A. I don't have any specific recollection of 2 sending this email. Exhibit 7 says it's an email 3 from me, strangely to me, so I can't explain -- I 4 sent to it myself.</p> <p>5 Q. Well, isn't your practice to send 6 materials to a large number of people and putting 7 their addresses on the bcc line?</p> <p>8 A. I've done that before.</p> <p>9 Q. Okay. And so this is an email you sent 10 with a link, exact same link from Exhibit 6, to 11 Breitbart story, correct?</p> <p>12 A. It appears to be.</p> <p>13 Q. And this story, which is also pasted in 14 the body of the email, is titled "Illegal Foreign 15 Voting in Virginia Covered Up by Soros-backed 16 Democratic Officials, Says Report." Do you see that?</p> <p>17 A. That's what it says.</p> <p>18 Q. And so this is the Breitbart story with 19 regard to the release of Alien Invasion I, yes?</p> <p>20 A. I don't know. Let me read it. 21 Do you have one with an author name on it? 22 This refers to the Alien Invasion report.</p> <p>23 Q. You wrote, "Folks, a through story on 24 PILF's alien voting report in Virginia. Breitbart 25 highlights the Soros link with the people directing</p>
<p style="text-align: right;">Page 32</p> <p>1 the coverup of the alien voter registration and 2 voting." Do you see that?</p> <p>3 A. It says that.</p> <p>4 Q. And in the subject line you just copied 5 the title of the article, is that right, into the 6 subject line?</p> <p>7 A. I don't know, because I don't have the 8 article in front of me. If you want to show me the 9 actual publication document, I can answer that. It 10 appears to be the title, but I can't say that 11 conclusively because I don't see the original 12 article.</p> <p>13 Q. Since you were circulating this article, 14 did you think it was a helpful article for PILF?</p> <p>15 A. I don't understand the question.</p> <p>16 Q. Well, why were you circulating this 17 article?</p> <p>18 A. I don't remember.</p> <p>19 Q. You don't know why?</p> <p>20 A. I answered the question.</p> <p>21 Q. You can put that aside. 22 (Adams Exhibit 8 marked for 23 identification: Email correspondence 24 from (topmost) R Reagan sent 25 10/3/2016</p>	<p style="text-align: right;">Page 33</p> <p>1 PILF-ADAMS-0040246 - 0040250)</p> <p>2 Q. The court reporter has marked as Exhibit 8 3 a document with the Bates number 40246. 4 Do you recognize this?</p> <p>5 A. I see Exhibit 8.</p> <p>6 Q. And do you recognize Exhibit 8 to be 7 emails that you had with individuals at Fox News?</p> <p>8 A. Well, it says it's from Robert Reagan at 9 Fox News.</p> <p>10 Q. So let's begin with the first email in the 11 chain, which would be on page 3 of the chain. Do you 12 see it's a copy of the email that we were just 13 looking at in Exhibit 7?</p> <p>14 A. It appears to be.</p> <p>15 Q. And so this is, again, an email from you 16 to you forwarding the Breitbart story on Alien 17 Invasion I, correct?</p> <p>18 A. Okay. Could you either reread or re-ask 19 that? I didn't understand what you were asking.</p> <p>20 Q. And so the first email in this chain in 21 Exhibit 8 is the email that you sent on -- that we 22 saw in Exhibit 7, which, again, is an email from 23 yourself to yourself dated October 3rd, forwarding 24 the Breitbart story, correct?</p> <p>25 A. Which exhibit?</p>

<p style="text-align: right;">Page 34</p> <p>1 Q. The previous exhibit, Exhibit 7.</p> <p>2 A. It appears to be.</p> <p>3 Q. And in response to this email that you</p> <p>4 sent, you received an email from Queenette Karikari?</p> <p>5 A. It's close enough. Right.</p> <p>6 Q. How do you pronounce her name?</p> <p>7 A. Queenette.</p> <p>8 Q. Queenette. And she is with Lou Dobbs</p> <p>9 Tonight?</p> <p>10 A. Correct.</p> <p>11 Q. And so she received the email that you</p> <p>12 sent. Presumably she was blind-copied?</p> <p>13 A. I don't know. I mean, that's one</p> <p>14 possibility. I wouldn't disagree with that, but I</p> <p>15 don't know for sure.</p> <p>16 Q. And she responds, "Good afternoon,</p> <p>17 Christian. Thank you so much for making this work</p> <p>18 today. Lou is thrilled to have you joining us." Do</p> <p>19 you see that?</p> <p>20 A. I can read that.</p> <p>21 Q. Did you appear on Lou Dobbs' program with</p> <p>22 regard to Alien Invasion I?</p> <p>23 A. I don't have a specific recollection that</p> <p>24 I did. If you have something that would refresh that</p> <p>25 recollection, I'd be happy to talk about it.</p>	<p style="text-align: right;">Page 35</p> <p>1 Q. And in response to -- well, strike that.</p> <p>2 So also the email says, "hit time is 7:45 from</p> <p>3 the D.C. bureau with Lou here in New York," right?</p> <p>4 And so she's trying to set up logistics for an</p> <p>5 interview.</p> <p>6 A. Okay. You asked two questions. Which one</p> <p>7 do you want me to answer?</p> <p>8 Q. She's trying to set up logistics for an</p> <p>9 interview.</p> <p>10 A. This is how it normally happens.</p> <p>11 Q. So that's yes.</p> <p>12 A. Well, I can't speak to what her intention</p> <p>13 is, but it certainly looks like she's trying to make</p> <p>14 arrangements.</p> <p>15 Q. Okay. And then you respond with a set of</p> <p>16 talking points; is that correct?</p> <p>17 A. No. I think what I responded with is</p> <p>18 quite possibly -- well, I don't know. I don't know</p> <p>19 what these are.</p> <p>20 Q. Okay. So you sent an email back to her in</p> <p>21 response with a link to the Alien Invasion report; is</p> <p>22 that right?</p> <p>23 A. No, I don't think -- I don't know. Okay.</p> <p>24 It's under a staple. There's a link. I don't know</p> <p>25 what that link is.</p>
<p style="text-align: right;">Page 36</p> <p>1 Q. And then underneath the link says this is</p> <p>2 the Virginia report.</p> <p>3 A. Right, and it says that underneath that.</p> <p>4 Q. And then there are a series of bullet</p> <p>5 points, correct?</p> <p>6 A. You could call them that.</p> <p>7 Q. And the first bullet says, "In our small</p> <p>8 sample of just eight Virginia counties who responded</p> <p>9 to our public inspection request, we found 1,046</p> <p>10 aliens who registered to vote illegally," correct?</p> <p>11 A. It says that.</p> <p>12 Q. And then the next sentence says, "These</p> <p>13 were only the ones that have been discovered as</p> <p>14 verified 100 percent aliens." It says that, right?</p> <p>15 A. That's what I'm reading.</p> <p>16 Q. What is a verified 100 percent alien?</p> <p>17 A. Well, it could be somebody who was removed</p> <p>18 from the voter rolls as being declared a noncitizen</p> <p>19 by the Commonwealth of Virginia.</p> <p>20 Q. Is that what you're referring to here?</p> <p>21 A. I don't remember what I was referring to</p> <p>22 there.</p> <p>23 Q. And then in the fifth bullet you state in</p> <p>24 the middle, "we show voter registration forms where</p> <p>25 the aliens lie ..."</p>	<p style="text-align: right;">Page 37</p> <p>1 A. One, two, three, four, five.</p> <p>2 Q. Are you there?</p> <p>3 A. Not yet. Right, I'm there.</p> <p>4 Q. "We show voter registration forms where</p> <p>5 the aliens lie (and commit federal felonies) and say</p> <p>6 they are a citizen." Do you see that?</p> <p>7 A. That's what it says. Describes the</p> <p>8 process.</p> <p>9 Q. And this doesn't refresh your recollection</p> <p>10 as to whether or not you appeared on Lou Dobbs?</p> <p>11 A. It doesn't. There's frequently cancels,</p> <p>12 sometimes not cancels.</p> <p>13 (Adams Exhibit 9 marked for</p> <p>14 identification: Illegal Foreign</p> <p>15 Voting in Virginia Covered up by</p> <p>16 Soros-backed Democratic Officials</p> <p>17 with attachment)</p> <p>18 Q. The court reporter has marked as Exhibit 9</p> <p>19 a copy of the October 2nd, 2016 Breitbart article,</p> <p>20 correct, along with comments on that article?</p> <p>21 A. It's 124 pages. I don't see anything in</p> <p>22 here that's not part of an article, so it would</p> <p>23 appear the answer is yes.</p> <p>24 Q. So on the first page, the article is</p> <p>25 entitled "Illegal Foreign Voting in Virginia Covered</p>

up by Soros-backed Democratic Officials, says report," do you see that?

A. It says that.

Q. And this is a story that you had circulated as seen in the previous exhibits, correct?

A. The headlines match.

Q. The web address matches?

A. Right.

Q. And then you're quoted in this article in the second paragraph, correct?

A. It says that I am quoted.

Q. So you provided an interview to Breitbart.

A. I don't have any recollection of that.

This could have been given to Breitbart a variety of different ways. One is an interview. I don't have any recollection of speaking with Neal McCabe.

Q. And then if you turn to the second page, there's blue highlighting. Do you understand that to be links?

A. Where are you referring to?

Q. Well, there's a blue highlighted Public Interest Legal Foundation. Do you understand that to be a link to your website?

A. Probably that's what that is, but if I had it up on the screen it would be easier to answer your

question.

Q. And then you agree this is -- this entire story is about the Alien Invasion I report, generally speaking?

A. No, I would not agree with that.

Q. You would not --

A. I would very much disagree with that.

Q. So this is -- you don't think this story is about PILF's Alien Invasion I report?

A. You just changed your question. You dropped a word.

Q. Okay. So yes, I did --

A. Which one --

Q. -- I dropped the word "entire."

A. That's correct.

Q. Yes. So there are aspects of this story that were not in Alien Invasion I report, correct?

A. Before his appointment by governor, Democratic Governor Terry McAuliffe, Cortes was a left-wing operative of the Virginia Voting Rights Restoration Campaign within the left-wing Advancement Project. The project was funded and supported by George Soros, through his Tides

Foundation Open Society.

And then it goes on to say, one of the top priorities of the Soros' Advancement Project is to stop the use of SAVE to purge voter lists.

Those are two things that I don't believe are in the Alien Invasion report about the priorities, but there may very well be other things in here that are not related to the Alien Invasion report.

Q. Right. But you provided that information that you just quoted to Breitbart, correct?

A. I don't think so, but if you have a document to refresh my recollection, I'd be happy to discuss it.

Q. At the end of the article, page 4, you are quoted as saying, last sentence, "We name the names of the registered voters removed from the rolls for citizenship problems. Will DOJ prosecute any of them?" Do you see that?

A. I see that.

Q. Now if you look to the next page, following this article on Breitbart, at least as of March 14th, 2018 when this document was printed out from their website, there was 1,487 comments. Do you see that?

A. I see it says that.

Q. And following the article are those comments. There's about -- there's 124 pages here, correct?

A. Well, I testified earlier when I was attempting to --

Q. Right.

A. -- I think I already did, a low number for a Breitbart article, but it's 124 pages printed.

Q. Do you spend a lot of time on Breitbart?

A. What do you mean by "a lot of time"?

Q. Well, you just said it was a low number for a Breitbart article, which presumes that you have familiarity with how many comments are posted on Breitbart articles, yes?

A. Familiarity, which could be obtained through other ways besides spending time on Breitbart.

Q. Okay. So how else are you familiar with how many comments get posted to Breitbart?

A. By discussing it with editors of Breitbart.

Q. If you turn to page 2 of 124 --

A. 2 ...

Q. -- of 124.

A. So these are two different documents in

1 Exhibit 9 combined into one document?

2 Q. For printing, to have it all print out  
3 correctly, yes.

4 A. Okay.

5 Q. Are you there on page 2?

6 A. I'm looking at page 2.

7 Q. Third posting from the bottom, someone  
8 posting under the name RINOpocher.

9 A. I am not RINOpocher.

10 Q. I didn't ask that.

11 A. You didn't ask anything.

12 Q. Right. I'm just directing you to the  
13 RINOpocher comment.

14 A. I see it.

15 Q. Do you see that? Okay. RINOpocher said,  
16 "These are felonies, right? Have people been  
17 deported or imprisoned?" "Any noncitizen caught  
18 voting should immediately be deported." Do you see  
19 that?

20 A. I see someone expressing their opinion.

21 Q. And do you see the little 60 and up arrow  
22 underneath that?

23 A. I see the word 60 with an arrow.

24 Q. Right. And you understand that -- do you  
25 understand that to be 60 favorable votes?

1 A. No. I don't understand that to be  
2 anything.

3 Q. You haven't discussed with Breitbart's  
4 editors how individuals in the comments section get  
5 to vote up or down on various comments?

6 A. No. And, again, you made a commentary  
7 with your expression after my answer, let the record  
8 reflect. It's not the first time that's happened.

9 Q. And --

10 (Crosstalk between counsel)

11 MR. LOCKERBY: This is supposed to be the  
12 equivalent of a court proceeding, and I don't think  
13 in the United States District Court for the Eastern  
14 District of Virginia, Alexandria Division, you would  
15 be there making the kinds of faces at the witness in  
16 view of the judge and jury that you are right now.  
17 And it's intended to harass and provoke the witness.

18 THE WITNESS: And I'll just let the record  
19 reflect every time it happens.

20 MR. TEPE: I disagree strongly with the  
21 tactic of inserting into the record your subjective  
22 viewpoints with regard to how I turn a page or look  
23 at my co-counsel.

24 THE WITNESS: This wasn't -- my comment  
25 wasn't related to either of those options. They were

1 specifically related to the facial -- if I might  
2 finish -- the facial expression you made of  
3 disapproval and dismay at my answer that the camera  
4 did not catch, but I would be happy to put in the  
5 record every time it happens.

6 MR. TEPE: And I am going to object to the  
7 imposition into the record your subjective  
8 commentary, which is not responsive to my questions.

9 Your position is noted. I would like to  
10 continue this deposition with the witness providing  
11 responsive answers to the questions. Can we all  
12 agree to that, counsel?

13 MR. LOCKERBY: We can agree to that, and  
14 it would proceed much more smoothly if counsel  
15 wouldn't engage in the kinds of antics that no  
16 federal judge would tolerate, especially not in this  
17 court.

18 Q. If you turn to page 8 of 124, do you see  
19 third from the bottom a comment by EOD?

20 A. No.

21 Q. I'm sorry. Third from the top. My  
22 apologies. EOD, third from the top.

23 A. I see something from EOD.

24 Q. Yes. He said, "Make illegally voting  
25 punishable by death and watch people take notice of

1 the laws in place for voting." Do you see that?

2 A. I can read it says that.

3 Q. Okay. And there is a 92 and an up arrow,  
4 right?

5 A. 92 and a what?

6 Q. Up arrow.

7 A. It says 92 underneath it.

8 Q. Yes, and next to the 92 is an up arrow.

9 A. There's an arrow.

10 Q. Pointing up, right?

11 A. Yeah, but I don't have any idea what that  
12 is.

13 Q. I understand.

14 A. I mean, I don't understand your question.  
15 That's disgusting. What does it have to do with me?

16 Q. If you turn to page 15 of 124, at the top  
17 there's a posting from NeverHillary?

18 A. Yeah. I'm not NeverHillary.

19 Q. I didn't ask you if you're NeverHillary.  
20 Do you see that posting?

21 A. I see a posting from NeverHillary on --

22 Q. And NeverHillary posts, "I'm okay with the  
23 executions." Do you see that?

24 A. I can read it says that.

25 Q. Okay. And then six spots down do you see

1 it states, from a Snailmailtrucker, "execute them and  
2 it will stop immediately ... are you willing to feed  
3 them and pay for their medical for the rest of their  
4 miserable lives? F them!" Do you see that?

5 A. It says that.

6 Q. And then there's a 13 with a up arrow  
7 underneath.

8 MR. LOCKERBY: I would just register a  
9 standing objection to the "up arrow" question.

10 A. There's a 13 written down.

11 Q. And next to it is --

12 A. There's an arrow.

13 Q. -- arrow pointing up.

14 A. Yeah. I've testified I don't know what  
15 that is.

16 Q. If you turn to page 18 of 124, the third  
17 comment from the bottom, Sons of Liberty, it says,  
18 "Any sort of voting fraud should carry capital  
19 punishment. The problem is that we have been  
20 completely infiltrated. Top to bottom." Do you see  
21 that comment?

22 A. I can read that it says that.

23 Q. And then underneath there's a comment from  
24 bobruark, who says, "They will only notice if they  
25 are actually put to death not just talked about it."

1 Do you see that?

2 A. I can read that it says that.

3 Q. Would you agree that the comments that  
4 we've just read are threatening?

5 MR. LOCKERBY: Object to the form.

6 A. That's an interesting question that  
7 carries a lot of philosophical things. They are not  
8 pleasant, by any stretch. I would find them to be  
9 disgusting and sort of the thing that I personally  
10 have comments made about me like this all the time,  
11 not the least of which are some of the articles that  
12 your PR firm helped place in this litigation in  
13 places like Mother Jones and TP and Muckraker.

14 I had comments very similarly that were  
15 horrible, but you -- but I personally found them  
16 inconvenient. And so when you ask me the question,  
17 do I find these threatening, I find them familiar  
18 because I have them made about me.

19 And so the question becomes are they genuinely  
20 threatening. I personally find them threatening but  
21 not a genuine threat when they are made toward me.

22 In other words, I've never called the police  
23 when these sorts of comments are made about me. When  
24 your PR firm placed those articles and those comments  
25 that were made about me in the coverage of this

1 lawsuit, I never called the police regarding any of  
2 those threatening comments.

3 Now this last one, "any sort of voting fraud  
4 should carry capital punishment, the problem is we've  
5 been completely infiltrated top to bottom," that one  
6 actually seems to be an expression of an opinion  
7 rather than a threat, because it is somebody's view  
8 toward public policy. Obviously very extreme and one  
9 with which I would not agree, but there's nothing in  
10 that particular one that appears to be threatening.

11 "They will only notice if they are actually  
12 put to death, not just talked about it," that's a  
13 little bit different than Sons of Liberty because  
14 they are actually seemingly advocating an action.

15 And so is it threatening in its nature yes,  
16 but is it a genuine threat? I'd say no because I  
17 don't think I've ever been actually put to death  
18 after those articles about this lawsuit appeared.  
19 And so ultimately you have to decide what's a real  
20 threat and what isn't a real threat.

21 And some of these are horrible, horrible  
22 comments, ones that I would never make and ones that  
23 I would disavow if I had the time to chase them down  
24 every day. But are they threatening to a particular  
25 person? No, I don't think they are.

1 MR. LOCKERBY: And I'm just going to  
2 register a standing objection to this line of  
3 questioning to save time because the only relevant  
4 issues in this case would be the publications, not  
5 third-party publications and comments.

6 (Adams Exhibit 10 marked for  
7 identification: Email correspondence  
8 from (topmost) K Phillips sent  
9 4/5/2016 with attachment  
10 PILF-ADAMS-0038892 - 0038895)

11 MR. TEPE: The court reporter is marking  
12 Exhibit 10, a document with the Bates number 8 -- I'm  
13 sorry -- 38892.

14 Q. Do you recognize this document?

15 A. No, not right now.

16 Q. The first email in this chain is from you  
17 dated April 5th, 2016 to Steve Bannon.

18 A. That's what it says.

19 Q. And it's forwarding a press release about  
20 a lawsuit against the city of Philadelphia; is that  
21 correct?

22 A. Appears to.

23 Q. And Mr. Bannon responds to you asking,  
24 "what does this mean"; is that right?

25 A. It says that.

<p style="text-align: right;">Page 50</p> <p>1 Q. And then you provide an answer that same</p> <p>2 day, and I want to direct your attention to the</p> <p>3 second sentence where it says, "we are about to sue</p> <p>4 three other large urban areas in swing states for the</p> <p>5 same problem." Do you see that?</p> <p>6 A. It says that.</p> <p>7 Q. What are the swing states that you are</p> <p>8 referring to?</p> <p>9 A. I'm not going to reveal that. That's</p> <p>10 privileged. You're asking for work product.</p> <p>11 Q. Why did you refer to those as swing</p> <p>12 states?</p> <p>13 A. Again, I'm not going to answer your</p> <p>14 questions about these potential cases, and I don't</p> <p>15 recall specifically what swing states were.</p> <p>16 Q. Mr. Bannon responds, "Can we play this</p> <p>17 up???" Do you see that?</p> <p>18 A. He says that or the email reflects him</p> <p>19 saying that.</p> <p>20 Q. And then you respond, "sure, or you can</p> <p>21 wait for when we sue the next large urban area in a</p> <p>22 key swing state."</p> <p>23 A. The email says that.</p> <p>24 Q. Then it says, "coming in the next three</p> <p>25 weeks." Do you see that?</p>	<p style="text-align: right;">Page 51</p> <p>1 A. It says that.</p> <p>2 Q. Was that a reference to your lawsuit</p> <p>3 against the City of Alexandria?</p> <p>4 A. I don't know.</p> <p>5 Q. You did sue the City of Alexandria in</p> <p>6 April, didn't you?</p> <p>7 A. I don't -- I mean, possibly. I'm not</p> <p>8 disagreeing with you. I just don't know.</p> <p>9 Q. And then the last sentence you say here</p> <p>10 is, "big cities that turn states one way or another</p> <p>11 in presidential elections." Do you see that?</p> <p>12 A. It says that.</p> <p>13 Q. What was the import of adding that last</p> <p>14 sentence?</p> <p>15 A. Because that is what differentiates media</p> <p>16 interest in a lawsuit versus media interest in a case</p> <p>17 such as ACRU vs. Jefferson Davis County Mississippi,</p> <p>18 for which there was no interest in covering that</p> <p>19 case.</p> <p>20 Q. But your sentence is not about coverage;</p> <p>21 it's about turning states one way or another in</p> <p>22 presidential elections, correct?</p> <p>23 A. My answer remains the same. What</p> <p>24 generates media interest in litigation, as many</p> <p>25 people know, is places that create media interest,</p>
<p style="text-align: right;">Page 52</p> <p>1 and, as I said a moment ago, big cities create far</p> <p>2 more media interest in cases than a case such as ACRU</p> <p>3 vs. Jefferson Davis County Mississippi, a case which</p> <p>4 I brought and am very familiar with the level of</p> <p>5 media interest in that case.</p> <p>6 Q. Mr. Bannon responds, "let's wait, but get</p> <p>7 to us when you need us to go large." Do you see</p> <p>8 that?</p> <p>9 A. It says that.</p> <p>10 Q. And then you forwarded his response to</p> <p>11 folks internally at PILF, correct?</p> <p>12 A. There is an email to people at PILF</p> <p>13 forwarding the Bannon email.</p> <p>14 Q. And in that email you quote, "when you</p> <p>15 need us to go large," closed quote.</p> <p>16 A. That's what it says.</p> <p>17 Q. Do you know why you quoted that portion of</p> <p>18 his email?</p> <p>19 A. Right. Yes, I do.</p> <p>20 Q. Okay. Why?</p> <p>21 A. Because it was Mr. Bannon volunteering to</p> <p>22 cover whatever it is we were referring to.</p> <p>23 Q. Then in the next paragraph, I think it's</p> <p>24 the fourth sentence in the email says, "but I'm</p> <p>25 grooming them." Do you see that?</p>	<p style="text-align: right;">Page 53</p> <p>1 A. No. Where? "But I'm grooming them for</p> <p>2 something down the road."</p> <p>3 Q. "-- VA, NC or FL." I'm sorry.</p> <p>4 A. Go ahead.</p> <p>5 Q. "When Bannon," quote, "goes large," closed</p> <p>6 quote, "he goes really large." Do you see that?</p> <p>7 A. Not yet.</p> <p>8 Q. The sentence right after "VA, NC or FL."</p> <p>9 A. Right, I see that.</p> <p>10 Q. VA, NC or FL, are those swing states?</p> <p>11 A. You shouldn't have this document. This</p> <p>12 should be clawed back, this portion at least, and I'm</p> <p>13 not going to answer any questions about it. That</p> <p>14 should have been redacted.</p> <p>15 MR. TEPE: Counsel, do you want to go off</p> <p>16 the record?</p> <p>17 MR. LOCKERBY: Not particularly, but if</p> <p>18 you want to we can.</p> <p>19 MR. TEPE: Why don't we go off the record.</p> <p>20 MR. LOCKERBY: Okay.</p> <p>21 VIDEO SPECIALIST: We are off the record,</p> <p>22 10:17.</p> <p>23 (Proceedings recessed)</p> <p>24 VIDEO SPECIALIST: We're back on the</p> <p>25 record, 10:37.</p>

1 BY MR. TEPE:

2 Q. Mr. Adams, before the break we were  
3 discussing the present exhibit in front of you,  
4 Exhibit 10, and you wanted certain information to be  
5 redacted, correct?

6 A. More or less. I think what happened was I  
7 said I wasn't going to testify about certain  
8 information that should be redacted.

9 Q. Okay. And my understanding is that the  
10 identity of the jurisdictions or states listed is  
11 what you would like to have redacted; is that right?

12 A. Correct.

13 Q. Okay. So what I'll do is, I will ask  
14 questions that do not pertain to the identity of  
15 those jurisdictions, fair enough?

16 A. Fair enough.

17 Q. In the statement that says, "when Bannon  
18 goes large, he goes really large," you saw that,  
19 right?

20 A. It says that.

21 Q. Do you consider Breitbart's coverage of  
22 Alien Invasion I to be an example of going large?

23 A. Not really.

24 Q. What do you consider to be an example of  
25 Breitbart going large?

1 A. Pigford.

2 Q. What is that? I'm sorry?

3 A. P-I-G-F-O-R-D.

4 Q. Okay. But not -- but not their four-page  
5 coverage of the Alien Invasion I report?

6 A. That's my testimony.

7 Q. You can put this document aside.

8 (Adams Exhibit 11 marked for  
9 identification: "Watchdog claims 5k  
10 Noncitizens Registered to Vote in  
11 Virginia" with attachment)

12 Q. The court reporter has marked as Adams  
13 Exhibit 11 a copy of another Breitbart article.  
14 Would you agree with that?

15 A. Exhibit 11, no, I would not agree with  
16 that. It's more than a copy of a Breitbart article.

17 Q. It's a copy of a Breitbart article plus  
18 comments to that article.

19 A. It appears to be that.

20 Q. And this article is titled "Watchdog  
21 Claims 5k Noncitizens Registered to Vote in  
22 Virginia"?

23 A. That's what the headline says.

24 Q. It's dated May 30th of 2017?

25 A. That's what the article says.

1 Q. And it contains coverage of PILF's Alien  
2 Invasion II report; is that right?

3 A. I'm trying to find where it says that.

4 Q. Well, there's a --

5 A. Oh, there's a picture on the third page.

6 Q. Right. This is -- they've actually posted  
7 the content of at least some of the report, correct?

8 A. Where do you see that?

9 Q. Well, where you see the image, right above  
10 it is Alien Invasion II by Public Interest Legal  
11 Foundation on S-C-R-I-B-D, SCRIBD.

12 A. It says that.

13 Q. And at SCRIBD -- you post documents on  
14 SCRIBD, right?

15 A. Right, but they didn't post the content at  
16 Breitbart, it doesn't look like, but I don't know.  
17 It doesn't appear that from the paper copy. It  
18 appears they posted a link to the content. There's a  
19 difference.

20 Q. Fair enough. And also there's images of  
21 voter registration forms, two voter registration  
22 forms in the article?

23 A. Two, right.

24 Q. And these two voter registration forms are  
25 for individuals who checked no on their voter

1 registration form to the answer, "Are you a citizen  
2 of the United States of America?"

3 A. Well, it's more than that. It's voter  
4 registration forms of individuals who checked no that  
5 they were citizens of the United States of America  
6 and yet were still registered to vote in Virginia.

7 Q. Right. And you, in Alien Invasion II,  
8 found 40-some odd examples out of 700 voter  
9 registration forms that you looked at, correct?

10 A. I didn't look at any voter registration  
11 forms.

12 Q. You can put this document aside.

13 You recall that PILF secured coverage in other  
14 media besides Breitbart, correct?

15 A. If you have something to refresh my  
16 recollection, I can talk about it. I'm sure we did,  
17 but I don't have any specific recollection.

18 Q. I can provide you with a couple of  
19 examples.

20 (Adams Exhibit 12 marked for  
21 identification: Email correspondence  
22 from (topmost)  
23 adams@electionlawcenter sent  
24 6/2/2017 PILF-ADAMS-0014964)

25 Q. The court reporter has marked as Exhibit



<p style="text-align: right;">Page 58</p> <p>1 12 a document with the Bates number 14964. Do you 2 see that?</p> <p>3 A. 14964, Exhibit 12, I have that.</p> <p>4 Q. And it is an email from you dated June 5 2nd, 2017?</p> <p>6 A. It says that that's what it is.</p> <p>7 Q. And the subject line is "Report: More than 8 5,000 Noncitizen Voters Purged From Rolls in VA   Fox 9 News Insider." Do you see that?</p> <p>10 A. I read that as the subject header.</p> <p>11 Q. And then there's a link to a Fox News 12 story, correct?</p> <p>13 A. There's a link after that.</p> <p>14 Q. Right. And this is a link to coverage of 15 the Alien Invasion II report, correct?</p> <p>16 A. If you show me the story, I can answer 17 that. I can't answer that from Exhibit 12. There's 18 a chance it is, there's a chance it isn't, but if you 19 have the actual document, I can answer questions 20 about it.</p> <p>21 Q. So you think there's a chance that the 22 linked story, which has a title, "More than 5,000 23 Noncitizen Voters Purged from Rolls in VA," is not 24 about Alien Invasion II?</p> <p>25 A. That wasn't my testimony.</p>	<p style="text-align: right;">Page 59</p> <p>1 Q. I'm trying to clarify your testimony. Is 2 that your testimony?</p> <p>3 A. My testimony was I can't answer that 4 without seeing the document. There is some chance 5 that this is a derivative story that never mentions 6 Alien II. That's how the media works. That there 7 can be a story that mentions the problem but not the 8 source of discovery of the problem.</p> <p>9 So it would be easier to answer your question 10 if you gave me a copy of the linked story. 11 (Adams Exhibit 13 marked for 12 identification: Email correspondence 13 from (topmost) L Churchwell sent 14 5/30/2017 PILF-ADAMS-0046157)</p> <p>15 Q. The court reporter has marked as Exhibit 16 13 a document with the Bates number 46157. Do you 17 see that?</p> <p>18 A. Yeah, I see that document.</p> <p>19 Q. Do you recall forwarding an article from 20 the Daily Caller or a link to an article on the Daily 21 Caller May 30th, 2017?</p> <p>22 A. No.</p> <p>23 Q. But this document reflects that you sent 24 an email on May 30th to Logan Churchwell, correct?</p> <p>25 A. That's what the document reflects.</p>
<p style="text-align: right;">Page 60</p> <p>1 Q. And in the email you sent a link to a 2 Daily Caller article titled "Virginia booted 5,556 3 noncitizens from voter rolls, report says."</p> <p>4 A. Okay. You're reading the link on Exhibit 5 13, you're not reading the headline, and that's what 6 the document says.</p> <p>7 Q. You can put that aside. Actually you ask 8 in the subject line, "What's with Pickett?" And then 9 in the body you say, "What's up with her?" Did you 10 have a problem with this article?</p> <p>11 A. I testified I don't have a specific 12 recollection of this particular article.</p> <p>13 Q. PILF also promoted the Alien Invasion 14 reports on TV, correct?</p> <p>15 MR. LOCKERBY: Object to the form.</p> <p>16 A. I don't understand what you mean by PILF 17 promoted. I --</p> <p>18 Q. PILF discussed the Alien Invasion reports 19 on TV, correct?</p> <p>20 A. Well, it wouldn't surprise me that 21 somebody who works at PILF discussed the Alien 22 Invasion reports on TV. But if you have a specific 23 example you want me to talk about, perhaps you could 24 either reference it or refresh my recollection with a 25 document.</p>	<p style="text-align: right;">Page 61</p> <p>1 Q. And you have appeared on TV to discuss the 2 Alien Invasion reports, correct?</p> <p>3 A. I think we already covered that, didn't 4 we? I was on Lou Dobbs. You showed me a document 5 that refreshed my recollection regarding an 6 appearance that probably occurred on Lou Dobbs, 7 although it was left open whether or not it actually 8 occurred. It would not surprise me that I did.</p> <p>9 Q. Do you recall appearing on Fox &amp; Friends 10 to provide an exclusive unveiling of Alien Invasion 11 I?</p> <p>12 A. Exclusive unveiling? No, I don't.</p> <p>13 Q. Do you recall appearing on Fox &amp; Friends 14 to discuss Alien Invasion I?</p> <p>15 A. Probably. That, I think, but I don't 16 remember when that was, but I have some recollection 17 of appearing on Fox &amp; Friends to discuss Alien I. 18 Whether or not it was exclusive, I don't -- I would 19 disagree with that.</p> <p>20 Q. Right, because we saw there was coverage 21 of Alien Invasion I on Breitbart, for example, so it 22 wouldn't be exclusive.</p> <p>23 A. Well, "exclusive" is a term of art in the 24 media that I'm not sure you're asking a question that 25 reflects the usage of the term in an accurate way.</p>

1 So I don't understand the question.

2 Q. On May 30th, 2017, when Alien Invasion II  
3 was released, you appeared on Tucker Carlson Tonight  
4 on Fox News; is that right?

5 A. I don't know.

6 (Adams Exhibit 14 marked for  
7 identification: Screenshots re Fox  
8 News May 30, 2017).

9 MR. TEPE: The court reporter has marked  
10 as Exhibit 14 printouts from a website that reflect  
11 an appearance by Mr. Adams on Tucker Carlson's  
12 program on May 30th, 2017.

13 Q. Do you agree with that?

14 A. No, I don't.

15 Q. What do you disagree with?

16 A. The transcript. I found a number of  
17 nongrammatical and implausible things, so I take  
18 issue with the transcript.

19 Q. Okay. But the question is, to refresh  
20 your recollection, sir, does this refresh your  
21 recollection that you appeared on Tucker Carlson's  
22 program on May 30th of 2017?

23 A. Right, and I've appeared on his show  
24 multiple times. So the document purports -- and I  
25 don't know what the source of this is. This is

1 not -- I don't know where this comes from. There's  
2 like a University of Virginia logo at the top middle  
3 of the screenshot.

4 So I don't know what -- what sort of document  
5 this is ultimately. It's some kind of screen capture  
6 and attempt at doing a transcript.

7 (Video clip played)

8 Q. We've just played a clip of your  
9 appearance on Tucker Carlson, would you agree?

10 A. It appears to be that.

11 Q. And that's you speaking right there?

12 A. It is.

13 MR. TEPE: We're going to provide the  
14 court reporter and mark as Exhibit 14-A a copy of  
15 this clip.

16 (Adams Exhibit 14-A marked  
17 for identification: Video clip)

18 MR. LOCKERBY: For the record, will the  
19 entire interview be the clip or just the part that  
20 was displayed?

21 MR. TEPE: The entire interview. We just  
22 want Mr. Adams to authenticate that, yes, he did  
23 appear on Tucker Carlson's program, and that this is  
24 indeed him.

25 MR. LOCKERBY: We would stipulate to that.

1 MR. TEPE: Okay.

2 Q. Mr. Adams, in preparation for your  
3 appearance on Mr. Carlson's program at that time, do  
4 you recall asking your team to find voter  
5 registration forms with outlandish names?

6 A. Oh, I sure do. And there's a reason for  
7 that.

8 (Johnson Exhibit 25  
9 previously marked for identification  
10 and referenced herein: Email  
11 correspondence from (topmost) N  
12 Johnson sent 5/26/2017  
13 PILF-ADAMS-000770 - 0000771)

14 MR. TEPE: I'm handing the witness what  
15 has been previously marked as Johnson Exhibit 25.

16 Q. Do you recall this email chain?

17 A. Yep.

18 Q. It begins with an email from you May 26th,  
19 2017 to Tucker Carlson. Do you see that?

20 A. That's what it says.

21 Q. And you sent him an embargoed release on a  
22 report we are putting out on Tuesday. That was Alien  
23 Invasion II, correct?

24 A. It most likely was.

25 Q. And then you have a bunch of bullets

1 underneath the words "Key Findings"?

2 A. Well, I'm not sure where these came from.  
3 These might have been from the report. I don't know  
4 for sure.

5 Q. The Key Findings.

6 A. I just said I don't know where they came  
7 from. They might have been from the report. They  
8 might have been quoting the report, but it's on the  
9 document, Johnson 25.

10 Q. And then you got a response from  
11 Mr. Carlson's booker; is that right?

12 A. Where do you see that?

13 Q. Kelly McNally, senior booker, Tucker  
14 Carlson Tonight.

15 A. Right, 5:40, it says that.

16 Q. And then you forwarded this internally and  
17 asked, "can you get me a few pages of just the screen  
18 captures of some no checkboxes?" Do you see that?

19 A. It says that.

20 Q. You said, "pick ones with outlandish  
21 foreign names, particularly Middle Eastern, if they  
22 exist." Right?

23 A. That's what it says.

24 Q. Why did you want your team to pick  
25 outlandish foreign names?

1 A. Because it starkly illustrates the defect  
2 in the existing voter registration system in Virginia  
3 and generally across the country with the honor  
4 system of election registrars not checking  
5 citizenship.

6 If you were to look at Adams Deposition  
7 Exhibit 11 from today, the Breitbart article, there's  
8 a perfect example to answer your question.

9 And on that article there is a copy of a voter  
10 registration application with a name that I think  
11 would qualify here, and that is why this is  
12 important, and it's critically important actually, is  
13 you need to remember that these particular -- should  
14 we stop or -- I'm sorry.

15 Q. No, no.

16 A. These particular voter registration forms  
17 are almost universally entered by hand. So there's  
18 an election official who is entering these voter  
19 registration forms by hand. The person who is  
20 entering them by hand also has the obligation of  
21 ensuring that the form is filled out correctly. If  
22 you were to look at Adams Deposition Exhibit 11, you  
23 see a perfect example of what I'm trying to point out  
24 and ask for.

25 And here you have a voter registration name of

1 an individual that I cannot even pronounce. It  
2 appears to be Malaysian, which is exactly, by the  
3 way, what I was really asking for here.

4 And every single time that that voter  
5 registration official keys in a letter, if their eye  
6 would only go up two degrees on the form or perhaps  
7 an inch or less, when they were typing the form in  
8 for Adams Exhibit 11 that's referenced and shown,  
9 which is Myagmarradnaa Batbold, it's an extremely  
10 long, foreign name that is very unfamiliar to most  
11 Americans, and at any one of those keystrokes, had  
12 the election official merely glanced up a quarter  
13 inch, they would have seen, "Are you a citizen of the  
14 United States of America?" and the answer of  
15 Myagmarradnaa Batbold was "no" in Adams Exhibit 11,  
16 and at that point this person should have never been  
17 registered to vote.

18 So if you can produce voter registration  
19 forms, as I asked for, of different types of names  
20 that would be unfamiliar to the election official who  
21 was hand keying in the name, it would be a greater  
22 illustration of the failure of the system to register  
23 the voter who explicitly marked, no, they are not a  
24 citizen of the United States, as this particular  
25 election official did.

1 And, by the way, that logic, I think, is one  
2 that is shared by common sense Americans who may have  
3 been viewing the Tucker Carlson Show, and they could  
4 see the voter registration forms as problematic. And  
5 I wouldn't be surprised if this particular form from  
6 Myagmarradnaa Batbold was given to the Carlson show.

7 Q. Alien Invasion II, the scope of Alien  
8 Invasion II, was not limited to those individuals who  
9 checked no on the voter registration form to the "Are  
10 you a citizen of the United States?" question,  
11 correct?

12 A. That's incorrect. It actually was limited  
13 to that because election officials had told us that  
14 you don't get on the voter registration noncitizen  
15 declared -- strike that.

16 It actually is incorrect because election  
17 officials told us you do not get on the declared  
18 noncitizen cancellation list unless at some point you  
19 answered no to the citizen checkbox question. So I  
20 very much disagree with your question. It's wrong.

21 Q. Your -- strike that. In Alien Invasion II  
22 you looked at over 700 voter registration  
23 applications, correct?

24 A. Well, I personally did not, no, that's not  
25 correct.

1 Q. PILF looked at over 700 voter registration  
2 applications, correct?

3 A. Well, that was a question for last  
4 Thursday.

5 Q. PILF -- you're the president of PILF,  
6 correct?

7 A. Right.

8 Q. Yes. And you worked on the Alien Invasion  
9 II report.

10 A. I didn't work on that part of it, no, I  
11 did not.

12 Q. You didn't read it and approve its  
13 release?

14 A. That's a different question you're asking  
15 me.

16 Q. My question, sir, is: It is true that  
17 PILF reviewed over 700 voter registration  
18 applications, correct?

19 A. And I answered you. I don't know.

20 Q. And of those 700 plus voter registration  
21 applications, only 40 something showed individuals  
22 checking the "are you a citizen" box, no, such as the  
23 ones that you provided to the Tucker Carlson Show?

24 A. No, I disagree completely because they  
25 would not have ended up on the declared noncitizen

list if at some point they hadn't marked the citizen checkbox no. There's absolutely no way that anybody could end up on that list, according to what election officials told me, unless at some point in the process they testified under oath on a voter application form under penalty of perjury that they were not a citizen of the United States.

Q. Was the goal of providing these voter registration applications on -- or images -- on Tucker Carlson's show to get his viewers outraged?

A. Our goal was to exercise our First Amendment right to illustrate a problem in the system that only the most unreasonable people would disagree with is a problem, and that the vast majority of Americans agree is a problem, and federal law bans, which is the involvement of foreign nationals in U.S. federal elections.

And so the goal on the Tucker Carlson Show was to starkly illustrate defects in the system that is allowing people who are not Americans to vote in American elections. That was the goal.

Q. The individual that you just testified about who you thought was Malaysian, such names are not representative of the names listed in the Virginia cancellation reports. You would agree with

that, correct?

A. I don't understand what you're talking about. Representative? He's not multiply listed.

Q. Right. But you said that this individual's name would key election officials to the fact that this person was probably not a citizen.

A. That's not what I testified to.

Q. Okay.

A. If you'd like, I'll clarify it so you understand this clearly.

Q. Certainly.

A. What I testified to was the longer the name and the less familiar with the name, you -- you cranked in there would key them in to being a noncitizen. That's not what I testified to.

What I testified to was the longer the name, the more time the election official had to glance less than an inch up on the form and see.

So this name provided an election official with ample opportunity to do their job correctly and look up at the "are you a citizen question," which is marked no, and to never have allowed this person to get on the rolls. It is a classic example of how the system is totally, completely broken.

Q. So is it your testimony that it's not --

strike that.

Is it your testimony that the length of the name should provide the election officials an indication as to whether or not they're a citizen?

A. Yes, and let me explain why. First of all, the length of the name, most names that election officials see are shorter than the one in Adams Exhibit 11 that is referenced in the exhibit. So that's the first part.

But the second part is the length of the name, every single one of those letters provides a keystroke, and every single one of those letters involving a keystroke is an opportunity to glance up. It is a more time spent on the application.

So the longer the name obviously provides an opportunity for the election official to do the job right, which in this particular instance they did not do.

Q. Is it also your testimony that, if the name is unfamiliar to the election official, that should also provide an indication as to their citizenship?

A. Unfamiliar is not the keyword. The correct -- the correct characterization of my testimony is foreign. And common sense would show --

some might not like to hear this, but it's commonsensical -- that, if a name is incredibly unfamiliar to the election official, it might clue them in as a matter of common sense to glance at the "Are you a citizen of the United States?" checkbox, like on Deposition Exhibit 11, that was marked no, and so if a name is not familiar, then it is not a controversial characteristic of human behavior to look at the question on the form that relates to whether or not you're a U.S. citizen.

Q. The exhibit we were just looking at, Johnson 25 --

A. Johnson 25? Right, Johnson 25.

Q. When you were asking for folks at PILF to pick ones with outlandish foreign names, you said, "particularly Middle Eastern, if they exist." Do you see that?

A. It says that.

Q. Why did you want Middle Eastern names?

A. They tended to be the longest. The only names that I've seen that are longer than Middle Eastern names are Malaysian names, which I think Deposition Exhibit 11, actually the one I've been quoting, I think that is a Malaysian name. I did not have confidence that my staff would be able to

1 differentiate between a Malaysian name and a  
2 non-Malaysian name, but I knew they would be able to  
3 differentiate between a Middle Eastern name and a  
4 non-Middle Eastern name. And on top of that, Middle  
5 Eastern names are probably the longest in the entire  
6 option of long names in the world.

7 Q. Are there any other aspects of a person's  
8 name that you believe should provide election  
9 officials with clues as to citizenship?

10 MR. LOCKERBY: Object to the form of the  
11 question, misstates the witness's testimony.

12 A. "Any other aspects" ... I mean, I think  
13 I've testified to two of them.

14 Q. Right. And so is there a third? I'm just  
15 trying to understand.

16 A. There could be.

17 Q. Is there any other aspects sitting here  
18 today that you believe provide an indication as to  
19 citizenship?

20 A. Well, I didn't say it provided an  
21 indication as to citizenship. You're, once again --

22 There are aspects of the names that provide an  
23 indication to the election official that they ought  
24 to look at whether or not the citizenship checkbox  
25 was filled out, yes, that's -- that's what my

1 testimony is. It's a moment in the administrative  
2 process that has failed at least in one circumstance,  
3 and, as we now know around the country, in many, many  
4 circumstances.

5 And so the name is a great starting point  
6 to -- to carefully scrutinize the application, which  
7 should have been done in the first place but  
8 obviously is not always done.

9 Q. On October 3rd, 2016 you were interviewed  
10 by Dana Loesch on the BlazeTV; is that right?

11 A. I don't know.

12 (Adams Exhibit 15 marked for  
13 identification: YouTube screenshot  
14 from theblaze "Christian Adams Joins  
15 Dana")

16 Q. The court reporter has marked as Exhibit  
17 15 a printout from YouTube. Does this refresh your  
18 recollection as to an appearance with Ms. Loesch?

19 A. It doesn't because I've appeared on her  
20 show many times. I'm not disputing the fact that  
21 that is me on Exhibit 16, but about the specific  
22 appearance, it doesn't refresh my recollection other  
23 than there's a good chance that it occurred.

24 Q. This document, which, again, is a printout  
25 from YouTube, indicates BlazeTV, on October 3rd,

1 2016, "Christian Adams joins Dana," correct, that's  
2 what it says there?

3 A. I don't see that. Okay. Right, there it  
4 is.

5 (Video clip played)

6 Q. We just played a clip of your appearance  
7 on Ms. Loesch's program. Do you recognize yourself  
8 there on the screen?

9 A. Right.

10 Q. Do you have any reason to doubt that you  
11 appeared on her program to talk about the Alien  
12 Invasion I report?

13 A. No.

14 Q. Thank you. We will move this as Exhibit  
15 15-A.

16 (Adams Exhibit 15-A marked  
17 for identification: Video clip)

18 Q. You've also made a number of radio  
19 appearances, correct?

20 A. I've made hundreds of radio appearances.

21 Q. And in some of those appearances you spoke  
22 about the Alien Invasion reports, correct?

23 A. Probably, but not necessarily. If you  
24 have a specific one to refresh my recollection, I'd  
25 be happy to talk about it.

1 Q. You appeared on the John Fredericks Show  
2 on June 1st, 2017 to talk about Alien Invasion II; is  
3 that right?

4 A. I don't know who John Fredericks is. I  
5 can't tell you. I have no recollection of who John  
6 Fredericks is.

7 (Adams Exhibit 16 marked for  
8 identification: YouTube screenshot  
9 John Fredericks Show)

10 Q. The court reporter has marked as Exhibit  
11 16 a printout also from YouTube indicating an  
12 appearance by you on The John Fredericks Show. Does  
13 this refresh your recollection?

14 A. No, it doesn't. I don't know who John  
15 Fredericks is. I'm sorry.

16 Q. The John Fredericks Show airs on multiple  
17 radio stations in Virginia. Do you recall that?

18 A. No.

19 (Video/audio clip played)

20 Q. We're playing a clip of your appearance.  
21 Does this refresh your recollection? Does this  
22 refresh your recollection of appearing on the John  
23 Fredericks Show?

24 A. It doesn't, but it refreshes my  
25 recollection of giving the article to someone at

1 Skadden Arps who got it placed in the Bull Elephant  
2 and probably arranged for this media interview.

3 So perhaps you-all have some documents that  
4 would better refresh my recollection, because I have  
5 no memory of this.

6 Q. Okay. Strike the response.

7 Does this refresh your recollection of  
8 appearing on the John Fredericks Show?

9 A. It does not. And, as a matter of fact, it  
10 refreshes my recollection no more than the fact that  
11 I was possibly asked if it involves the Bull Elephant  
12 that somebody at Skadden Arps has the documents  
13 related to this interview, because I have no memory  
14 of this except that it related to Skadden Arps lawyer  
15 who made the arrangements probably for this to occur  
16 because it's in the Bull Elephant.

17 (Video/audio clip played)

18 Q. This is -- this is you speaking, correct?

19 A. It sounds like me speaking.

20 Q. Do you have any reason to doubt that you  
21 appeared on the John Fredericks Show on June 1st,  
22 2017 to talk about Alien Invasion II?

23 A. I'm not disputing whether or not I  
24 appeared. You asked me if my recollection was  
25 refreshed, and, no, it isn't, but I'm not disputing

1 that that's my voice.

2 Q. Well, that's my question now. Thank you.

3 A. Right.

4 MR. TEPE: We'll mark this as Exhibit  
5 16-A.

6 (Exhibit 16-A marked for  
7 identification: Video/audio clip)

8 Q. On March 2nd, 2017 you were interviewed on  
9 the program Mornings on the Mall, yes?

10 A. I don't know.

11 (Adams Exhibit 17 marked for  
12 identification: Re podcast Mornings  
13 on the Mall March 2, 2017)

14 Q. The court reporter has marked as Exhibit  
15 17 a document that is a printout indicating an  
16 appearance by you on Mornings on the Mall. Does this  
17 refresh your recollection?

18 A. No.

19 Q. The printout indicates that you appeared  
20 on March 2nd, 2017. Are you familiar with the  
21 program Mornings on the Mall?

22 A. I'm not sure it still exists, but I  
23 recognize the name of the program.

24 Q. It was a program aired on WMAL here in  
25 D.C.?

1 A. Correct.

2 (Audio clip played)

3 Q. Do you recognize your voice?

4 A. Yes.

5 Q. We don't have keyed up the beginning where  
6 it announces your appearance on WMAL. We can find  
7 that, if you want, but we're going to --

8 A. Yeah. I don't have the ability to  
9 authenticate if this is me -- the entire interview or  
10 not. There's no way I can. But that was my voice.

11 MR. TEPE: We'll mark this entire clip as  
12 17-A.

13 (Exhibit 17-A marked for  
14 identification: Audio clip)

15 A. Which I haven't heard, by the way.

16 Q. Understood.

17 A. Okay.

18 Q. That's why it will be provided to the  
19 court reporter.

20 PILF wanted to share the Alien Invasion  
21 reports with as many viewers as possible; you would  
22 agree?

23 A. Well, that was -- I can't speak for PILF  
24 in this deposition.

25 Q. You're the president of PILF.

1 A. Right. I can speak for me.

2 Q. Right.

3 A. And what was your question as it relates  
4 to me?

5 Q. Well, you wanted to share the Alien  
6 Invasion reports with as many viewers as possible.

7 A. I never thought about that, at least that  
8 I can remember.

9 Q. And you wanted to share the Alien Invasion  
10 reports with as many readers as possible, right?

11 A. Again, I have no recollection of ever  
12 consciously having that thought process that I can  
13 remember right now.

14 Q. Would you agree that identifying large  
15 numbers of noncitizens would help PILF obtain  
16 publicity for its Alien Invasion reports?

17 A. Wait. Could you read that back? Would I  
18 agree that --

19 (The record was read by the reporter.)

20 A. Well, I don't know what you mean by  
21 "large." I think identifying any noncitizens who get  
22 on the rolls is a noteworthy story to most  
23 common-sense Americans who don't like noncitizens  
24 being on the rolls.

25 So I would say, even if it's not large

<p style="text-align: right;">Page 82</p> <p>1 numbers, it's any noncitizens on the rolls is an 2 important story. 3 (Johnson Exhibit 26 4 previously marked for identification 5 and referenced herein: Email 6 correspondence from (topmost) N 7 Johnson sent 10/2/2016 8 PILF-ADAMS-0037501). 9 Q. Handing the witness what has been marked 10 as previously as Johnson 26. 11 A. I have Johnson 26. 12 Q. Do you recognize this document? 13 A. It's -- I see Exhibit 26. 14 Q. And at the bottom is an email from you 15 dated October 2nd, 2016 to a number of individuals 16 associated with PILF; is that right? 17 A. No, it's not right. 18 Q. Strike that. This is an email from you 19 dated October 2nd, 2016, correct? 20 A. It is. It says that. 21 Q. And it's to Ms. Phillips and Ms. Powell 22 and Mr. Johnson and Mr. Vanderhulst. Those are all 23 individuals with PILF, correct? 24 A. Correct. 25 Q. And it copies Hans von Spakovsky. He's a</p>	<p style="text-align: right;">Page 83</p> <p>1 board member of PILF, correct? 2 A. Correct. 3 Q. And also Don Palmer is copied; is that 4 correct? 5 A. Yes. 6 Q. And the subject line is "Congratulations 7 Everyone." 8 A. That's what it says. 9 Q. And then it is, in the body of the email, 10 an image from the Drudge Report website; is that 11 right? 12 A. I'm sorry. At the bottom of the email? 13 Q. I said in the body of the email -- 14 A. Oh, body. 15 Q. -- there is an image from the Drudge 16 Report website; is that right? 17 A. It appears to be that. 18 Q. And this particular image has a link or -- 19 strike that. 20 This particular image shows a link that says, 21 "REPORT: 1,000 plus Illegal Voters in Virginia." Do 22 you see that? 23 A. Well, I might dispute the fact that it's a 24 link in the email, but it says that. 25 Q. Right. And you've been on the Drudge</p>
<p style="text-align: right;">Page 84</p> <p>1 Report website, correct? 2 A. Are you asking if I have visited the 3 Drudge Report website? 4 Q. Yes. Yes. 5 A. Yes. 6 Q. And the Drudge Report provides links to 7 other stories elsewhere on the Internet, correct? 8 A. It does do that. 9 Q. Okay. You said here, above the image, 10 "great lesson, how to generate, create, organize and 11 weaponize narrative." 12 A. That's what the email says. 13 Q. What did you mean by "narrative"? 14 A. Well, the country has endured people for 15 years, not the least of which is some of your 16 co-counsel in this case, arguing that noncitizen 17 voting is a myth, a problem, not a problem or 18 otherwise made up entirely. And your co-counsel's 19 organizations, two of them, as a matter of fact, have 20 been part of that narrative. 21 And what this means is that the truth can be 22 obtained about whether or not noncitizens are getting 23 on the rolls and in fact voting. And PILF is in the 24 process of documenting that nationwide. We'll 25 continue to do so.</p>	<p style="text-align: right;">Page 85</p> <p>1 And so when I say "narrative," I mean accounts 2 of whether something is or is not happening. 3 Plaintiff's counsel's law firms generally say it is 4 not happening and a wide variety of other 5 organizations say it is happening. 6 And so what I mean by this is how to develop 7 the evidence and facts to weaponize the story in a 8 way that disputes what the contentions are of the 9 people who say it's not happening. 10 Q. So if I understand your answer, the 11 narrative is demonstrating that voter fraud by 12 noncitizens is not a myth. 13 A. Well, I never said the word "voter fraud" 14 in my answer. As I recall, I thought I said 15 registration by noncitizens. 16 Q. Okay. 17 A. Is that what the transcript says? Because 18 there's a difference. 19 Q. I'm just trying to understand your answer. 20 A. Well, I mean, one way to do that is to 21 quote it correctly. 22 Q. So if I understand your answer, the 23 narrative is demonstrating that voting -- that 24 noncitizen voting is not a myth. 25 A. That's part of it. That's a very small</p>

part. But the bigger part is that there are defects in the system that Congress needs to remedy, that state legislatures need to remedy, that prosecutorial authorities need to take action and investigate. Because it is not subject to dispute in my mind that noncitizens are getting on the rolls and voting. That is a fact.

And so public policymakers need to respond accordingly. And those who stand in the way of fixing the problem, as I said, like plaintiffs' law firms, need to realize that there is a problem and do something about it.

Q. That noncitizen registration and voting is a problem, not a myth. That's the narrative.

A. Look, you can characterize it however you want. I wouldn't disagree with what your latest question was, was a subset of that larger problem.

Q. In the email above you said to the same individuals listed, also on October 2nd, you wrote, "Noel, remember our conversation on how important it was to cross the one thousand mark (by adding Alexandria)." Do you see that?

A. It says that.

Q. So you thought crossing 1,000 people was important, how?

A. Well, I don't think anybody would disagree that 999 is different than 1,000.

Q. And then you said, "good example why below is in the chosen Drudge headline," correct?

A. Chosen Drudge headline validated my general observation about people's public perceptions about numbers.

Q. And it was an "important psychological frontier to cross," you say.

A. It says that.

Q. And so just as it was important to cross the 1,000 threshold, it was also important to cross the 5,000 threshold.

A. If you would show me the document you have ready, and I'll refresh my recollection about that.

Q. I'm just asking a question.

A. And I'm just giving you an answer. I don't have a specific recollection of that.

Q. I'm not asking for a recollection. Strike that.

(Adams Exhibit 18 marked for identification: Email correspondence from (topmost) N Johnson sent 5/22/2017)

PILF-ADAMS-0001050 - 0001052)

Q. The court reporter has marked as Exhibit 18 a document with the Bates number 1050. Do you see that?

A. I've been handed Deposition Exhibit 18.

Q. And what I want to direct your attention to is -- and just to set the stage -- you had requested cancellation reports from the Virginia Department of Elections, right?

A. I don't think I ever did, no.

Q. PILF did.

MR. LOCKERBY: Object to the form of the question.

MR. TEPE: What's the objection?

MR. LOCKERBY: Well, it assumes facts not in evidence. The requests were actually directed to registrars, and then the Department of Elections interceded and prevented that from happening.

Q. On May 5th Mr. Johnson, PILF, wrote to Edgardo Cortes of the Virginia Department of Elections, "Thank you for providing the VERIS report. I would like to make a follow-up request for records under the NVRA." Do you see that?

A. No. Where are you?

Q. Bottom of the first page.

A. Oh. Okay. I'm not very familiar with this document, but there's -- you've pulled out of the middle email from 11:18 a.m., is that what you're asking about?

Q. Correct.

A. Okay. And you're asking me what it says?

Q. My question was, directing you to this email, do you see that Mr. Johnson wrote Mr. Cortes May 5th, 2017, yes?

A. The email says that.

Q. And then Mr. Johnson said, "Thank you for providing the VERIS report. I would like to make a follow-up request for records under the NVRA." Do you see that?

A. Right.

Q. And so does this recollection that you had received records from the Virginia Department of Elections for a certain time period and then you asked for the same record but for an additional time period?

A. I don't think you understand. I didn't ask for any of these, okay.

Q. PILF.

A. Yeah, but I'm not on these emails. So the answer to your question is, no, I did not ask for



1 these.

2 The question on Thursday might have been yes  
3 in my 30(b)(6), but the answer today in my personal  
4 is no, I didn't ask for these.

5 Q. PILF asked for records, the same records  
6 that were provided by the Virginia Department of  
7 Elections for the time period March 21st, 2017 to the  
8 present, which would be May 5th, is that right,  
9 according to this email?

10 A. Okay. And your question is that they  
11 asked for ... (reading) ... to the present, which  
12 this is a May 5th email. That's what it says.

13 Q. And then Mr. Cortes attached a report with  
14 activity from March 21st, 2017 to the present day,  
15 which at that point was May 22nd.

16 A. The email says, attached is a report with  
17 activity from 3-21-17 until today. Whether or not  
18 that report is attached or not, I have no earthly  
19 idea, because I'm not on this email and I never saw  
20 this email. It was not sent to me.

21 Q. And then right above that Mr. Johnson  
22 sends to you -- forwards Mr. Cortes's response -- on  
23 May 22nd, correct?

24 A. The email says that I am copied on an  
25 email from -- it forwards it to me.

1 Q. Yes. So on May 22nd Mr. Johnson forwarded  
2 Mr. Cortes's email to you and Mr. Churchwell,  
3 correct?

4 A. Well, he forwarded the body of the email.  
5 That's all that this 18 document -- Deposition 18  
6 Exhibit says. I can't speak to whether or not the  
7 attachments were forwarded. I don't know.

8 Q. And then Mr. Churchwell responds, "Woohoo  
9 headline upgrade!" Do you see that?

10 A. I can read that it says that.

11 Q. And Mr. Johnson says "high five" in  
12 response.

13 A. Is there a question?

14 Q. Do you see that?

15 A. I can read that it says that.

16 Q. And then Mr. Churchwell responds, "this  
17 puts us just north of 5,500, right?" Do you see  
18 that?

19 A. I can read that it says that.

20 Q. Okay. And so before you had received this  
21 supplement of records from the Virginia Department of  
22 Elections, PILF had received -- PILF had not received  
23 more than 5,000 names, correct?

24 A. I don't know.

25 MR. LOCKERBY: Object to the form.

1 A. I mean, I don't know. You're obviously  
2 focused in on this number far more than I was.

3 Q. Well, apparently Mr. Churchwell seemed to  
4 like it. He said "woohoo headline upgrade."

5 A. Mr. Churchwell is not sitting in this  
6 chair.

7 Q. What do you understand Mr. Churchwell to  
8 be intending by saying "woohoo headline upgrade"?

9 A. I don't know.

10 Q. Did you respond to his email on May 22nd  
11 saying what do you mean, "woohoo headline upgrade"?

12 A. Do you have an exhibit that would help  
13 refresh my recollection?

14 Q. So you have no recollection of sending  
15 that question to Mr. Churchwell?

16 A. If you -- no, not as I sit here, but if  
17 you have a document that would refresh my  
18 recollection, I'll take a look at it.

19 Q. Do you recall sending Noel Johnson an  
20 email on May 22nd asking him what he meant by "high  
21 five"?

22 A. I don't, but I wonder what they do mean by  
23 "headline upgrade," as I sit here now.

24 Q. You can put that document aside.

25 A. If you have a document that refreshes my

1 recollection, I'd be happy to talk about it.

2 (Adams Exhibit 19 marked for  
3 identification: Email correspondence  
4 from (topmost) N Johnson sent  
5 5/31/2017 PILF-ADAMS-0000760)

6 Q. The court reporter has marked as Exhibit  
7 19 a document with the Bates number 760. Do you see  
8 that?

9 A. I have Deposition 19.

10 Q. And do you recognize this as starting with  
11 an email that you sent to Mr. Churchwell copying  
12 Mr. Johnson on May 31st of 2017?

13 A. I see that. It says that.

14 Q. Do you have any reason to doubt that you  
15 sent this email?

16 A. No, no reason to doubt I sent it.

17 Q. The subject line is "Roseanne Barr."

18 A. That's what it says.

19 Q. And in the body of your email you have an  
20 image of what appears to be a tweet from Ms. Barr.  
21 Does that look accurate to you?

22 A. No. Well, no, not necessarily. It's  
23 something that she posted somewhere. YouTube maybe.

24 Q. Well, this is an image from Twitter,  
25 right?

1 A. I don't know. Are you representing it is?  
2 If you are, tell me and we can move forward. I don't  
3 see something that says Twitter on it. I see YouTube  
4 on it. If you want to represent to me it's from  
5 Twitter, I can answer your next substantive question.

6 Q. Well, I mean, you tweet, correct, we  
7 established that before, right?

8 A. I've asked and answered that question.

9 Q. Yes. And based on your tweeting habits,  
10 can you or can you not say that this appears to be an  
11 image of a tweet from Roseanne Barr?

12 A. I wouldn't say it's inconsistent with a  
13 tweet, but it says it's coming from YouTube, so ...

14 Q. Well, it appears to be a tweet from -- of  
15 Ms. Barr sending out a clip from YouTube.

16 A. If that's what you're representing to me  
17 it is, I have no reason to quarrel with that.

18 Q. Okay. Well, I'm just asking for your  
19 testimony as to what your understanding is since you  
20 sent this out.

21 A. And I've testified I don't have one.

22 Q. Ms. Barr said in her tweet, "five thousand  
23 illegals voted for Hillary in Virginia." Do you see  
24 that?

25 A. I see it says that.

1 Q. Okay. Now this clip here from YouTube is  
2 your appearance on Tucker Carlson, right?

3 A. I don't know. I have no way of knowing  
4 that. It's barely legible on Deposition Exhibit 19  
5 that's in front of me. It's in black and white. You  
6 can't even tell if it's me.

7 So there's lots of problems with that  
8 assumption. If you want to represent to me that it  
9 is, I will be happy to accept your representation as  
10 accurate.

11 Q. Well, the image, and I grant you it's in  
12 black and white, is that not you being interviewed by  
13 Tucker Carlson with the Capitol in the background and  
14 underneath it says, "Watchdog 5K Aliens Registered to  
15 Vote"?

16 A. The headline actually or the thing -- the  
17 part you just read, "Watchdog 5K," actually has more  
18 weight to me than the blocked image of what might be  
19 me, but I'm not going to quarrel with you. I just --  
20 if you tell me it is, we can move forward.

21 Q. So it appears that Ms. Barr sent out a  
22 clip of your appearance on Tucker Carlson with the  
23 notation, "5,000 illegals voted for Hillary in  
24 Virginia." Do you agree with that?

25 A. I agree that that's what the document

1 says.

2 Q. And Mr. Johnson responds to your email by  
3 saying, "Roseanne taking it up a notch from 5,000  
4 noncitizen removals to 5,000 illegal votes for  
5 Hillary." Do you see that?

6 A. I see that it says that.

7 Q. Do you recall tweeting out a response to  
8 Ms. Barr that her tweet was inaccurate?

9 A. If you have that, we could save a lot of  
10 time, because I don't have any recollection of that.

11 Q. You can put that document aside.

12 You have your own Twitter handle; is that  
13 correct?

14 A. You mean my name on Twitter? It's not my  
15 name. It's E-L -- it's something like E-L-E-C-T,  
16 Election Law Center.

17 Q. And you've tweeted under this Election Law  
18 Center handle with regard to the Alien Invasion  
19 reports, have you not?

20 A. I would be surprised if I didn't, but I  
21 don't have a specific recollection. If you have a  
22 document to refresh my recollection, it would be  
23 helpful.

24 (Adams Exhibit 20 marked for  
25 identification: Printout of

1 ElectionLawCtr tweets)

2 Q. The court reporter has marked as Exhibit  
3 20 an image of your tweets under the handle at  
4 Election Law Ctr; is that correct?

5 A. That's what the document, Exhibit 20, has.

6 Q. And this reflects tweets that you made  
7 with regard to the Alien Invasion I report; is that  
8 right?

9 A. Well, I don't have any reason to doubt the  
10 authenticity of this. If you want to -- if you want  
11 to stipulate or otherwise represent that that's what  
12 it is, I have no reason to disagree.

13 Q. So this does reflect tweets that you may  
14 have written with regard to the Alien Invasion I  
15 report.

16 MR. LOCKERBY: Object to the form.

17 A. I have no reason to doubt that this is  
18 authentic. Do I know with absolute certainty these  
19 are my tweets? No. But if you want to represent to  
20 me that that's where you pulled them from, I'll  
21 accept your representation.

22 Q. That is where we pulled them from. Does  
23 this refresh your recollection -- strike that.

24 One of the tweets you said is at the top,  
25 October 2nd, 2016, read report, "I just talked about

1 on Fox News about thousand plus foreigners registered  
2 or voting in Virginia." Do you see that?

3 A. That's what it says.

4 Q. When you said "foreigners" there, was that  
5 synonymous with noncitizens?

6 A. Well, words speak for themselves.

7 Q. No, I'm asking what you were intending by  
8 the word foreigners.

9 A. I have a hard time thinking of an example  
10 of a noncitizen who wouldn't be a foreigner. Maybe  
11 John Demjanjuk would be a counter-example, but I have  
12 a hard time imagining any other examples of a  
13 noncitizen who would not be an alien who would not be  
14 a foreigner.

15 Q. That's exactly where I was going to go  
16 next was are all these words in your mind synonyms,  
17 generally speaking, foreigner, alien and noncitizen?

18 A. Well, I think if you were to either pull  
19 up the U.S. Code of Law or Webster's, you might find  
20 that my interpretation of what these words mean is  
21 consistent with those sources.

22 Q. And in this tweet you published a link to  
23 the PILF website, correct?

24 A. There's a link to the PILF website.

25 Q. You also tweeted about the Alien Invasion

1 II report; is that correct?

2 A. I would be surprised if I did not tweet  
3 about the Alien Invasion II report, but if you have a  
4 document to specifically refresh my recollection, I'm  
5 more than happy to look at it.

6 (Adams Exhibit 21 marked for  
7 identification: Printout of tweets  
8 from ElectionLawCtr)

9 Q. The court reporter has marked as Exhibit  
10 21 -- does this refresh your recollection as to  
11 having tweeted about the Alien Invasion II report?

12 A. This is helpful, but it does include  
13 things not related to your question.

14 Q. But there are tweets there from your  
15 Election Law Center Twitter handle with regard to  
16 Alien Invasion II, correct?

17 A. There are, but they are not entirely.

18 Q. You can put that aside.

19 You also have your own website  
20 www.electionlawcenter.com; is that correct?

21 A. I have a web server that I use.

22 Q. Is that different than a website?

23 A. Yes. One is an email server.

24 Q. Okay. But you recall that you have a  
25 website www.electionlawcenter.com.

1 A. Right, I have that domain.

2 Q. You have that domain, right?

3 A. Right. I own it.

4 Q. Yes. And you've posted about the Alien  
5 Invasion reports there, have you not?

6 A. I don't think so, no.

7 (Adams Exhibit 22 marked for  
8 identification: Printout from  
9 Election Law Center | Report:  
10 Ineligible Aliens Registering to  
11 Vote and Casting Ballots)

12 Q. The court reporter has marked as Exhibit  
13 22 a printout from the electionlawcenter.com website.  
14 Does this refresh your recollection, Mr. Adams?

15 A. No.

16 Q. That is at the bottom the URL for your  
17 website?

18 A. Not really. I mean, this is a URL, the  
19 domain. It's a domain that I own. So the URL is a  
20 domain that I own.

21 Q. Right. And on the URL, domain -- strike  
22 that.

23 On the domain that you own, you posted about  
24 Alien Invasion I, correct?

25 A. Incorrect. I did not.

1 Q. So are you saying that this is fabricated?

2 A. No.

3 MR. LOCKERBY: Object to the form.

4 Q. Okay. You just testified that you did not  
5 post about Alien Invasion I; is that your testimony?

6 A. That is my testimony.

7 Q. This document in front of you, which was  
8 printed out from your website --

9 A. Again, it's not my website.

10 Q. Would you prefer the website of the --  
11 with the domain that you own?

12 A. Correct.

13 Q. This shows "Report: Ineligible Aliens  
14 Registering to Vote and Casting Ballots." Do you see  
15 that title?

16 A. It says that.

17 Q. It says, "Public Interest Legal Foundation  
18 published a report based on voting history records in  
19 Virginia showing that large numbers of ineligible  
20 aliens are registering to vote and casting ballots."  
21 Do you see that?

22 A. You are reading the exhibit correctly.

23 Q. And then it says, "in just eight Virginia  
24 counties 1,046 ineligible noncitizens were found to  
25 have illegally registered." Do you see that?

1 A. You are reading Deposition Exhibit 22  
2 accurately.

3 Q. And I'm not just representing -- strike  
4 that.

5 I'm not just reading Deposition Exhibit 22  
6 accurately, but this is an accurate reading of what's  
7 on your Election Law Center domain, correct?

8 MR. LOCKERBY: Object to the form.

9 A. No, it is not. It is a -- it is -- you  
10 are reading something from a website domain that I  
11 own. There's a vast difference between that and  
12 where you're headed with this.

13 Q. Where am I headed?

14 A. You're headed -- you're headed to get my  
15 assent to agree to this document and that either that  
16 I wrote it or I agree with it or something of that  
17 nature, but the fact is that this is a website domain  
18 that I own. It is not my website.

19 Q. Why would a website domain that you own  
20 not be your website?

21 A. Well, I own electionlawcenter.com, but I  
22 don't use it.

23 Q. Well, then who posted this?

24 A. Not me.

25 Q. Well, who has -- who has access to your

1 domain?

2 A. The answer is right there in Deposition  
3 Exhibit 22.

4 Q. Do you want to specify?

5 A. You can see who posted it.

6 Q. Who posted it?

7 A. It says right there in Deposition 22. It  
8 says Lex.

9 Q. Well, that's -- who is Lex?

10 A. Not me. And I never saw this posting  
11 until Deposition 22 was handed to me, Exhibit 22.

12 Q. So you don't -- you don't know who Lex is?

13 A. Oh, I know who Lex is, but you didn't ask  
14 me that yet.

15 Q. Well, who is Lex?

16 A. It's an individual who is an activist who  
17 covers election issues named Erin Anderson.

18 Q. And you let Erin Anderson post on the  
19 domain that you own?

20 A. Correct.

21 Q. And on the domain that you own there was a  
22 link published to Alien Invasion I, correct?

23 A. Well, Deposition 22 appears to show that  
24 is the case, but I don't have any independent  
25 knowledge of that other than what's in Deposition 22.

1 Q. Who else posts on your domain?

2 A. I used to, but I haven't been to that  
3 domain to post for probably years.

4 Q. Who else posts on your domain?

5 A. Me, other guests have posted. I don't  
6 remember everybody that's ever posted there.

7 Q. Who do you remember?

8 A. I'm not sure.

9 Q. You don't remember anyone else other than  
10 Erin Anderson?

11 A. Nope.

12 Q. Do you know why Erin Anderson posts under  
13 the name Lex?

14 A. Probably because she's afraid of being  
15 harassed by people if she posts under her real name.  
16 It's one possibility.

17 Q. So having a person's real name posted on  
18 the Internet can lead to harassment?

19 A. When you talk about voter fraud,  
20 absolutely, because there's a whole litany of  
21 organizations designed to personally attack people,  
22 as you well know, whenever they talk about the  
23 existence of voter fraud. And we have seen the  
24 depths to which they will plumb on that quest in this  
25 case.

1 Q. How does someone go about posting on your  
2 domain?

3 A. They write up a post and post it. But  
4 this is not my posting.

5 Q. Who approves the posting of things on your  
6 domain?

7 A. Nobody.

8 Q. What is the process for posting on your  
9 domain?

10 A. You post -- you write something and you  
11 put it up.

12 Q. You write a column for PJ Media; is that  
13 correct?

14 A. I do.

15 Q. And you've written about the Alien  
16 Invasion reports on PJ Media, correct?

17 A. Most likely, but if you have a specific  
18 document to refresh my recollection, I'm happy to  
19 look at it.

20 (Adams Exhibit 23 marked for  
21 identification: PJ Media | Yes,  
22 Virginia, Aliens are Registered or  
23 Voting ... and in Pennsylvania, by  
24 the Thousands)

25 Q. The court reporter has handed you what's

<p style="text-align: right;">Page 106</p> <p>1 been marked as Exhibit 23. Do you recognize this?</p> <p>2 A. It appears to be a portion of a article</p> <p>3 that I wrote for PJ Media.</p> <p>4 Q. Why do you say "a portion"?</p> <p>5 A. Well, because some things are cut off on</p> <p>6 it. On its face, on pages 6, 7 and 8, there's -- you</p> <p>7 obviously had some difficulty in capturing a whole</p> <p>8 version of this document that didn't have things</p> <p>9 fractured.</p> <p>10 Q. Well, it appears the only thing that's cut</p> <p>11 off is an image that's repeated on every page, and it</p> <p>12 says, "PJ Media encourages you to read our --"</p> <p>13 something -- seems like "update to a cookie policy."</p> <p>14 Is there anything else that you can tell us is being</p> <p>15 cut off?</p> <p>16 A. Right, there is.</p> <p>17 Q. What?</p> <p>18 A. Well, normally there wouldn't be shading,</p> <p>19 for starters.</p> <p>20 Q. What's shading?</p> <p>21 A. On page 3. Shading usually has some sort</p> <p>22 of content in it.</p> <p>23 Q. I don't see the shading. Can you point it</p> <p>24 out to me?</p> <p>25 A. To the upper left quadrant of the page on</p>	<p style="text-align: right;">Page 107</p> <p>1 Deposition 23, page 3. There's also a hanging bubble</p> <p>2 box on page 2 that may extend to page 3, but the</p> <p>3 shading itself indicates there's something cut off.</p> <p>4 But, other than that, I don't have any quibbles with</p> <p>5 Deposition 23.</p> <p>6 Q. Okay. The content of what you wrote is</p> <p>7 represented here, correct?</p> <p>8 A. It appears to be, but sometimes the</p> <p>9 content of what one writes includes bubble boxes, and</p> <p>10 that's why the hanging shading issue is a concern.</p> <p>11 Q. But sitting here today, you're not aware</p> <p>12 of anything that's cut off --</p> <p>13 A. I'm not --</p> <p>14 Q. -- from what you wrote.</p> <p>15 A. Right. I didn't -- I didn't indicate</p> <p>16 there was. I'm just telling you that this document</p> <p>17 appears to be fractured with some content cues.</p> <p>18 Q. And this is a column you wrote published</p> <p>19 on October 3rd, 2016, correct?</p> <p>20 A. Deposition Exhibit 23 says it was</p> <p>21 published on October 3rd.</p> <p>22 Q. And you did publish a column on that day</p> <p>23 in PJ Media, correct?</p> <p>24 A. I have no reason to dispute what this</p> <p>25 document says.</p>
<p style="text-align: right;">Page 108</p> <p>1 Q. And that column concerned Alien Invasion</p> <p>2 I, correct?</p> <p>3 A. Right.</p> <p>4 Q. You wrote in the first paragraph, "What if</p> <p>5 government documents were produced to show at least</p> <p>6 one thousand instances of voter fraud with aliens</p> <p>7 registering or voting in a key swing state?" Do you</p> <p>8 see that?</p> <p>9 A. That's what the document says.</p> <p>10 Q. And you're referencing the Alien Invasion</p> <p>11 reports 1,046 cancellations; is that right?</p> <p>12 A. I would disagree with that. I think I was</p> <p>13 asking -- referencing a rhetorical question related</p> <p>14 to underlying election records to establish the</p> <p>15 possibility of aliens registering to vote.</p> <p>16 Q. Do you think this sentence is unrelated to</p> <p>17 the fact that in Alien Invasion I PILF said that</p> <p>18 there were 1,046 illegal registrants?</p> <p>19 A. I don't think it's unrelated to that fact.</p> <p>20 What I said was it's not only referring to that fact.</p> <p>21 Q. And on the next page of the exhibit it</p> <p>22 shows that you wrote, in just eight counties, 1,046</p> <p>23 alien noncitizens successfully registered to vote.</p> <p>24 Do you see that?</p> <p>25 A. That's an accurate statement.</p>	<p style="text-align: right;">Page 109</p> <p>1 Q. And you also wrote, "Mind you, these are</p> <p>2 just the aliens who were accidentally caught because</p> <p>3 when they renewed their driver's license they told</p> <p>4 the truth that they were a noncitizen." You wrote</p> <p>5 that, right?</p> <p>6 A. That's what the document says I wrote.</p> <p>7 Q. And you did write it.</p> <p>8 A. I don't have any reason to dispute that.</p> <p>9 Q. And you have insight into the truth of</p> <p>10 what these 1,046 individuals told the DMV?</p> <p>11 A. I do have insight into the truth.</p> <p>12 Q. Because you spoke to each of those</p> <p>13 individuals, correct?</p> <p>14 MR. LOCKERBY: Object to the form.</p> <p>15 A. I don't understand the question.</p> <p>16 Q. Well, you spoke to all 1,046 individuals,</p> <p>17 yes or no, right?</p> <p>18 A. Pardon? Yes or no, right?</p> <p>19 Q. Did you or did you not speak to the 1,046</p> <p>20 individuals listed in the Alien Invasion I as to the</p> <p>21 truth of their representations?</p> <p>22 A. No, I did not speak to all of them, but I</p> <p>23 had other insights into the truth apart from that.</p> <p>24 Q. Did you speak to any of them?</p> <p>25 A. I don't remember.</p>

<p style="text-align: right;">Page 110</p> <p>1 Q. You would --</p> <p>2 A. Actually I do remember. I did speak to</p> <p>3 some of them.</p> <p>4 Q. Well, isn't that a violation of the PILF's</p> <p>5 policy?</p> <p>6 A. I didn't tell you what I did yet. So, no,</p> <p>7 it wouldn't be a violation of PILF's policy. You</p> <p>8 didn't ask what the context was.</p> <p>9 So let me answer your question. No, it was</p> <p>10 not a violation of PILF's policies.</p> <p>11 Q. You spoke to someone who was contacted by</p> <p>12 The Washington Post.</p> <p>13 A. I spoke to somebody who was contacted</p> <p>14 purportedly by Justin Levitt.</p> <p>15 Q. And who is that?</p> <p>16 A. I don't remember.</p> <p>17 Q. And how did you come to contact this</p> <p>18 person?</p> <p>19 A. Don't remember that. And actually I don't</p> <p>20 understand your question. "Come to contact" could</p> <p>21 mean a lot of different things. If you could clarify</p> <p>22 that for me, it would be helpful.</p> <p>23 Q. You said you spoke to somebody who was</p> <p>24 contacted purportedly by Justin Levitt, and I want to</p> <p>25 know who is that somebody.</p>	<p style="text-align: right;">Page 111</p> <p>1 A. And I said to you -- I've asked and</p> <p>2 answered that question.</p> <p>3 Q. You don't remember; that's your answer?</p> <p>4 Is that your answer?</p> <p>5 A. I asked and answered that question.</p> <p>6 Q. Is your answer, I don't remember who you</p> <p>7 spoke to -- strike that.</p> <p>8 Is your answer that you do not remember the</p> <p>9 person you spoke to who was purportedly contacted by</p> <p>10 Justin Levitt?</p> <p>11 MR. LOCKERBY: Object to the form.</p> <p>12 A. I don't know. That question was</p> <p>13 confusing.</p> <p>14 Q. Well, what was confusing about it?</p> <p>15 A. All of it. There was very little that</p> <p>16 wasn't confusing. I might suggest starting from</p> <p>17 scratch and just asking.</p> <p>18 Q. You testified that you spoke to somebody</p> <p>19 who was contacted purportedly by Justin Levitt.</p> <p>20 MR. LOCKERBY: Objection to the form.</p> <p>21 Q. That was your testimony, right?</p> <p>22 A. Okay. You just asked me two questions.</p> <p>23 Did you withdraw the first?</p> <p>24 Q. Was it not your testimony just moments</p> <p>25 ago, quote, "I spoke to somebody who was contacted</p>
<p style="text-align: right;">Page 112</p> <p>1 purportedly by Justin Levitt," closed quote?</p> <p>2 A. If I said that, I stand by that testimony.</p> <p>3 Q. Now my question is: Who did you speak to?</p> <p>4 A. And I've asked and answered that, and I'll</p> <p>5 do it again. I don't remember.</p> <p>6 Q. Do you remember how you came to speak with</p> <p>7 this person?</p> <p>8 A. Okay. That's the part that I don't</p> <p>9 understand what you're asking me. How I came to</p> <p>10 speak with it is not a very specific question. If</p> <p>11 you could ask a less confusing question, I can answer</p> <p>12 it. I don't know what you mean.</p> <p>13 Q. Well, even though you don't remember the</p> <p>14 identity of the person, do you recall if you spoke to</p> <p>15 this person over the phone?</p> <p>16 A. Now we're on to something. By phone.</p> <p>17 Q. Did you call this person?</p> <p>18 A. Yes.</p> <p>19 Q. And why did you call this person?</p> <p>20 A. Because Justin Levitt purported to call</p> <p>21 this person.</p> <p>22 Q. How do you know that?</p> <p>23 A. Because he wrote an article about it.</p> <p>24 Q. Who?</p> <p>25 A. Justin Levitt or somebody else, but,</p>	<p style="text-align: right;">Page 113</p> <p>1 regardless, Justin Levitt was the source of this</p> <p>2 conversation.</p> <p>3 Q. And you reached out to that person.</p> <p>4 A. Correct, after I read the article that</p> <p>5 somebody had already contacted this person first.</p> <p>6 Q. How did you get the contact information</p> <p>7 for this person?</p> <p>8 A. Do not remember that.</p> <p>9 Q. Did you communicate with this person in</p> <p>10 any manner other than by phone?</p> <p>11 A. No.</p> <p>12 Q. Have you spoken with any other individuals</p> <p>13 listed among the 1,046 in Alien Invasion I?</p> <p>14 A. Possibly, but I don't have a specific</p> <p>15 recollection.</p> <p>16 Q. And you said that your speaking with the</p> <p>17 individual mentioned by Justin Levitt was not a</p> <p>18 violation of PILF's corporate policy, correct?</p> <p>19 A. I've asked and answered that question.</p> <p>20 Q. And why was that not a violation of PILF's</p> <p>21 corporate policy?</p> <p>22 A. Because Justin Levitt spoke with them</p> <p>23 first, and once contact is made with a registrant,</p> <p>24 the initial zone of peace is finished. In other</p> <p>25 words, Justin Levitt disrupted that person's life and</p>

<p style="text-align: right;">Page 114</p> <p>1 made contact, as he did by the hundreds in this case  2 in what was probably a violation of Virginia 18.2 452  3 and made contact with these individuals en masse,  4 and, once he did that, the corporate policy did not  5 apply -- particularly when Justin Levitt decides to  6 write about the content of these conversations in a  7 public way.  8 Q. And this corporate policy is not written  9 down anywhere?  10 A. Of course not.  11 Q. You wrote a column on PJ Media about Alien  12 Invasion II, correct?  13 A. If you have it to refresh my recollection,  14 I'm more than happy to look at it. I don't remember.  15 Q. Actually, before we get to that, I just  16 want to ask another question about your article in  17 the exhibit in front of you. I believe it's Exhibit  18 23.  19 On the second page, in the, I guess it's the  20 third full paragraph that begins "that's because," do  21 you see that? Do you see that paragraph?  22 A. I'm reading it. I see the paragraph.  23 Q. And you're referring to the checkbox as to  24 whether or not someone is a citizen, correct?  25 A. I'm referring to a lot of things. The</p>	<p style="text-align: right;">Page 115</p> <p>1 checkbox is a portion of what I'm referring to.  2 I'm also referring to the attestation when  3 somebody signs the document, the voter registration  4 form, they're making an attestation that they are  5 saying under penalty of perjury they are telling the  6 truth.  7 So if they -- if they were to say they are a  8 citizen and sign and then later say they are not a  9 citizen and sign, that one of the two is a lie,  10 that's what I'm referring to.  11 Q. And so that's -- when you say thousands  12 are lying just in Virginia, that's what you're  13 referring to.  14 A. Correct.  15 Q. Could they just be making a mistake?  16 A. Well, you've taken us right into the  17 debates in Congress in 1993 about whether or not the  18 answer to that question is yes or no. And that was  19 something that was heavily debated in Congress, and  20 I'm happy to recount the legislative history.  21 But the short of it is that everybody who  22 passed the bill in the legislative history believes  23 that between those two boxes you're not just making a  24 mistake. And this was the subject of a great deal of  25 debate in the House and the Senate as to what was the</p>
<p style="text-align: right;">Page 116</p> <p>1 effect of the attestations and the checkbox.  2 And the proponents of the legislation told the  3 formerly opponents of the legislation that the  4 checkbox and attestation would be sufficient to  5 overcome the premise of your question that they were  6 simply making a mistake.  7 And so the authors of the bill, the sponsors  8 of the bill, debated that very issue that you just  9 asked me in Congress extensively and ultimately  10 concluded that, no, this prevents mistakes. And I  11 relied on that, and anybody who -- who looks at this  12 statute or this legislative history of the statute  13 would see that that's a reasonable interpretation.  14 Q. I'm not sure if I understood that they  15 ultimately concluded that this prevents mistakes.  16 I'm not sure if I follow what you meant there.  17 A. I agree you don't follow it. And what it  18 means is that the proponents of this legislation  19 debated extensively the answer to the two questions  20 ago you asked me, and they built into the structure a  21 system that was designed to specifically preclude  22 somebody from asserting that a mistake was made,  23 specifically preclude that excuse from the process by  24 having the dual checkbox and attestation procedure.  25 And so if somebody makes an admission against</p>	<p style="text-align: right;">Page 117</p> <p>1 interest that they are not a citizen, as they did in  2 this case in these -- in these applications, which I  3 rely on throughout the videos and radio and documents  4 you're showing me, that they are not a citizen of the  5 United States, Congress in the legislative history  6 was very, very clear that that would preclude this  7 being a mistake, and, therefore, would subject them  8 to criminal prosecution. That's throughout the  9 legislative history of this statute.  10 Q. I apologize if I asked this question  11 already, but you do recall publishing a column in PJ  12 Media about Alien Invasion II; is that right?  13 A. You did ask that question already, and I  14 told you that if you had a document to refresh my  15 recollection ...  16 (Adams Exhibit 24 marked for  17 identification: Email correspondence  18 from (topmost) C Adams sent  19 5/30/2017  20 PILF-ADAMS-0000312 - 0000316)  21 Q. The court reporter has marked as Exhibit  22 24 a document with the Bates number 312. Do you  23 recognize this?  24 A. This is a -- Deposition Exhibit 24 appears  25 to be an email that I sent.</p>

<p style="text-align: right;">Page 118</p> <p>1 Q. On May 30th, 2017?</p> <p>2 A. That's what it says.</p> <p>3 Q. And your email sends along the content of</p> <p>4 a column you wrote in PJ Media; is that right?</p> <p>5 A. Well, it appears to. I don't know if it's</p> <p>6 right, but that's what it appears to do.</p> <p>7 Q. Well, do you recognize anything as missing</p> <p>8 from the PJ Media column from the email that you</p> <p>9 sent?</p> <p>10 A. Look, if you want to represent -- yes. If</p> <p>11 you want to represent to me that this is -- this is a</p> <p>12 document that represents the PJ Media column, I have</p> <p>13 no reason to quarrel with that.</p> <p>14 Q. Because you wouldn't normally forward your</p> <p>15 column by excluding portions of your column.</p> <p>16 A. Is there a question?</p> <p>17 Q. Correct?</p> <p>18 A. Yes, actually I would. I routinely save</p> <p>19 my recipients' time by not including an entire column</p> <p>20 and instead including excerpts, sometimes blurbs,</p> <p>21 sometimes nothing at all.</p> <p>22 So I would disagree with your question, or at</p> <p>23 least I would answer your question I would in fact do</p> <p>24 that. Whether I did it here, I have no reason to</p> <p>25 know, nor would I have the ability to answer your</p>	<p style="text-align: right;">Page 119</p> <p>1 question because I don't have the actual column with</p> <p>2 me. I don't think you've given it to me as an</p> <p>3 exhibit.</p> <p>4 Q. You include in your email a link to your</p> <p>5 column on PJ Media's website, yes?</p> <p>6 A. Well, that's how you solve the problem you</p> <p>7 just are talking about is you include the link.</p> <p>8 Q. My question was you include in your email</p> <p>9 a link to your column on PJ Media, yes?</p> <p>10 A. There is a link there.</p> <p>11 Q. To your column on PJ Media, yes?</p> <p>12 A. There is a link for PJ Media in there.</p> <p>13 Q. And it's to your column.</p> <p>14 A. I don't know. Probably is.</p> <p>15 Q. Would you send --</p> <p>16 A. I just said it probably is. I'm not the</p> <p>17 custodian of all link names, but I have no reason to</p> <p>18 quarrel with you, if that's what you're representing</p> <p>19 that that's what this is.</p> <p>20 Q. And you did send out this email, right?</p> <p>21 A. It doesn't appear to say "draft," so I</p> <p>22 have no reason to doubt that I sent it. Do I have a</p> <p>23 specific recollection I sent it? No.</p> <p>24 Q. On the second page of the exhibit, the</p> <p>25 second paragraph from the bottom, it begins "yet," do</p>
<p style="text-align: right;">Page 120</p> <p>1 you see that?</p> <p>2 A. I see that.</p> <p>3 Q. "Yet the PILF report demonstrates that</p> <p>4 hundreds of foreigners ended up on Virginia voter</p> <p>5 rolls even after telling Virginia election officials</p> <p>6 they were aliens on their voter registration form."</p> <p>7 Do you see that?</p> <p>8 A. That's what it says.</p> <p>9 Q. What's your basis for this statement?</p> <p>10 A. I don't have a specific recollection what</p> <p>11 the basis is for this statement right now. I have a</p> <p>12 general recollection that it relates to two</p> <p>13 categories of information. One would be data that</p> <p>14 PILF reviewed, and two would be conversations that I</p> <p>15 had with election officials.</p> <p>16 Q. What's the data that PILF reviewed?</p> <p>17 A. Well, look at the next paragraph. That</p> <p>18 probably gives you some insight into what sort of</p> <p>19 data.</p> <p>20 And, again, it says, "Consider Jiling Xiao,"</p> <p>21 which is J-I-L-I-N-G space X-I-A-O. It says:</p> <p>22 Xiao registered to vote during</p> <p>23 Barack Obama's campaign for</p> <p>24 President. Indeed, the report notes</p> <p>25 that 2008 was the year with the</p>	<p style="text-align: right;">Page 121</p> <p>1 highest rate of alien voting in</p> <p>2 Virginia. Xiao plainly marked NO to</p> <p>3 the question, are you a citizen of</p> <p>4 the United States, yet was</p> <p>5 registered to vote. Such is the</p> <p>6 flimsy check used to prevent alien</p> <p>7 voting.</p> <p>8 And then it has -- it has a variety of</p> <p>9 examples on the next page of the particular phenomena</p> <p>10 that was described.</p> <p>11 Q. It has two more examples.</p> <p>12 A. On the next page it has Yun Ok Bae and</p> <p>13 Juan Mones Cazon.</p> <p>14 Q. So there's three examples total?</p> <p>15 A. I'm sorry?</p> <p>16 Q. There are three examples of the data in</p> <p>17 your article; is that right?</p> <p>18 A. Well, you can have overkill in an article.</p> <p>19 If I had put more than three examples in here, that</p> <p>20 would bore readers in time.</p> <p>21 Q. Okay. But just so I understand, the data</p> <p>22 that you're referring to that PILF reviewed are voter</p> <p>23 registration applications; is that right?</p> <p>24 A. I'm not sure. I mean, that would</p> <p>25 certainly be a category of it.</p>



<p style="text-align: right;">Page 122</p> <p>1 Q. Well, you said one would be data that PILF 2 reviewed. And my question is: What is the data that 3 PILF reviewed that is the basis for this statement? 4 A. Well, I don't know because I didn't do the 5 review; staffers did. 6 Q. Right, but you're the president, and you 7 just -- you wrote this statement, right? 8 A. Well, let me add a third category, then. 9 Q. There's a question pending. You did write 10 this statement in your PJ Media column, right? 11 A. Asked and answered. 12 Q. And the answer is yes. 13 A. I've answered that question. 14 Q. And the answer is yes. 15 A. We can do this all day. 16 Q. And so my question now is, given that you 17 wrote this statement, what is the basis for your 18 statement? 19 A. Well, I've given you two categories of 20 information. I left out one. One -- a third 21 category of information would be assessments given to 22 me by staff who was reviewing the underlying records. 23 Q. Okay. So but I'm still trying to 24 understand what the data is that is the basis for 25 this statement.</p>	<p style="text-align: right;">Page 123</p> <p>1 A. Right, and let me go through once again 2 the list of the three. One -- 3 Q. I just want to focus on the first thing, 4 which is the data. Okay? What is the data that was 5 reviewed that makes up the basis for this statement? 6 A. We just talked about some of it. We just 7 talked about three examples that are in the article. 8 That's the first. 9 The second category, conversations I had with 10 various elections officials -- 11 Q. Okay. I understand, but -- 12 MR. LOCKERBY: Objection. The witness 13 ought to be allowed to finish his answer before 14 counsel moves on to another question. 15 MR. TEPE: I'm more than happy to get to 16 the second and third pieces. 17 Q. But what I want to do is I want to 18 focus -- my question was focused -- on the first 19 piece, okay? 20 And so you state here the PILF report 21 demonstrates that hundreds of foreigners ended up on 22 Virginia voter rolls even after telling Virginia 23 election officials they were aliens on their voter 24 registration form -- 25 A. Right.</p>
<p style="text-align: right;">Page 124</p> <p>1 Q. -- correct? Okay. And the data that you 2 have just articulated as being the basis for this 3 statement are voter registration forms; is that 4 right? 5 A. That's partially correct. 6 Q. Okay. And the data aspect of this, did 7 you have hundreds of voter registration applications 8 in which the applicant said that they were aliens? 9 A. Okay. What paragraph are you referring 10 to? The "yet" paragraph? 11 Q. Mm-hmm. 12 A. Okay. 13 Q. The same paragraph we've been talking 14 about for a few minutes now. 15 A. We had hundreds of records related to 16 people answering no on voter registration forms. 17 That's the first package of data of the three. That 18 would include voter registration forms, that would 19 include a variety of documents. 20 Q. So at this moment when you wrote this 21 article you had hundreds of voter registration 22 applications in which the applicants checked no, they 23 were not a citizen of the United States. 24 MR. LOCKERBY: Objection, asked and 25 answered, misstates the witness's prior testimony.</p>	<p style="text-align: right;">Page 125</p> <p>1 A. You're not withdrawing it? 2 Q. No. 3 A. Okay. You're mischaracterizing the 4 testimony that I gave. 5 Q. Okay. Well, then I'll ask another 6 question. 7 Did you or did you not, as of the date you 8 wrote this in May 30th, 2017, or -- strike that -- as 9 of the date of your email, May 30th, 2017, did you or 10 did you not -- strike that. 11 Actually, no, I'll continue that. As of this 12 date, May 30th, 2017, did you, Mr. Adams, have 13 hundreds of voter registration applications in which 14 the applicant indicated they were not a U.S. citizen? 15 A. That's not what the article says. You're 16 mischaracterizing what the article says. 17 Q. My question, sir, is, as of this date -- I 18 can -- I'll reread it. 19 As of this date, May 30th, 2017, did you, 20 Mr. Adams, have hundreds of voter registration 21 applications in which the applicant indicated they 22 were not a U.S. citizen? 23 A. Mr. Adams never had hundreds of anything, 24 so the answer is no, but that's also not what the 25 article says. And I wasn't the person who was</p>

<p style="text-align: right;">Page 126</p> <p>1 custodian of records, so I never had the records in 2 mass form. They weren't sent to me. So the answer 3 is always going to be, no, I didn't have those 4 records. 5 Q. Did PILF, as of this date, have hundreds 6 of voter registration applications in which the 7 applicant indicated they were not a U.S. citizen? 8 A. I can't remember what the answer to that 9 was in the 30(b)(6) deposition on Thursday. So and 10 Mr. Lockerby wasn't here for that deposition, so he 11 wouldn't know whether to lodge an asked and answered, 12 but I don't know the answer to that question from 13 last Thursday's deposition, as I sit here today. 14 Q. And if PILF did have hundreds of 15 applications, voter registration applications, in 16 which the applicant indicated they were not a U.S. 17 citizen, PILF would have noted that in the Alien 18 Invasion II report, correct? 19 A. I don't know. That's a speculative 20 what-if question. I don't know. 21 Q. And, in fact, PILF in the Alien Invasion 22 II report only noted that it had 40 some odd voter 23 registration applications in which the applicant 24 noted that they were not a U.S. citizen; is that 25 correct?</p>	<p style="text-align: right;">Page 127</p> <p>1 A. We have spent the last ten minutes in a 2 circular discussion when you knew the answer to this 3 and I didn't. 4 Q. And so there are not hundreds -- there are 5 not hundreds of voter registration applications in 6 which applicants indicated that they were aliens that 7 is the basis for this statement, correct? 8 MR. LOCKERBY: Object to the form. 9 A. You're wrong. There are hundreds. And 10 this statement is correct and truthful and accurate 11 and can be substantiated by government records, which 12 have been refused to be turned over to the defendants 13 by the Commonwealth of Virginia. 14 Q. Well, your statement is "the PILF report 15 demonstrates --" 16 A. Right. 17 Q. "-- that hundreds of foreigners ended up 18 on Virginia voter rolls even after telling Virginia 19 election officials that they were aliens on their 20 voter registration form." 21 This statement, you would agree, is not based 22 on having hundreds of voter registration application 23 forms in which the applicant indicated that they were 24 not a U.S. citizen, correct? 25 A. Nor does it purport to have -- to indicate</p>
<p style="text-align: right;">Page 128</p> <p>1 that they are in possession of hundreds of voter 2 registration forms. 3 Q. Okay. 4 A. You have convenient -- you have ignored 5 the multiple bundles of information which were 6 available to us in order to make it seem as if these 7 forms don't exist in the first place. 8 Q. So when I asked for the basis of this 9 statement, one of the things you mentioned was data, 10 and we've now established that, with respect to data, 11 you did not have hundreds of voter registration 12 applications in which the applicant indicated they 13 were not a U.S. citizen, correct? 14 A. We had other records that indicated that 15 those forms existed, and so we relied on those other 16 records, and I relied on those other government 17 records, which are inherently reliable, for writing 18 this statement in this article, as well as relying on 19 conversations with election officials and as well as 20 relying on conversations with my staff. 21 So I fundamentally disagree with you that we 22 were not aware of hundreds of other voter 23 registration forms on which we could rely. 24 Q. That wasn't my question, sir. 25 A. Well, I disagree with you on that. I</p>	<p style="text-align: right;">Page 129</p> <p>1 believe I answered your question. 2 Q. What else, other than this data aspect 3 that we've been talking about, what else is this 4 statement based on? 5 A. I've answered that question a couple of 6 times. 7 (Adams Exhibit 25 marked for 8 identification: Email correspondence 9 from (topmost) C Adams sent 10 12/18/2018 11 PILF-ADAMS-0046679 - 0046680) 12 Q. The court reporter has marked as Exhibit 13 25 a document with the Bates number 46679. 14 The bulk of this email appears to be an 15 attempt by Russian TV to get an interview with you in 16 October of 2016; is that right? 17 A. Could you direct me to the term "Russian 18 TV" on Deposition Exhibit 25? 19 Q. Well, it's from -- the first email is from 20 a senior producer, Elena Sokolova, RTR TV Russia. 21 A. Okay. This appears to be an effort by 22 somebody who works for RTR TV Russia to interview me. 23 Q. Yes. Do you recall providing an interview 24 to this outlet? 25 A. I don't think I did.</p>

<p style="text-align: right;">Page 130</p> <p>1 Q. And then you forwarded this email on 2 December 18th, 2018 to Mr. Johnson and 3 Mr. Churchwell. Do you see that? 4 A. I do. 5 Q. And the content of your email is redacted, 6 yes? 7 A. It appears to be. 8 Q. What is the basis for this redaction? 9 A. I would need to see the unredacted version 10 to tell you. 11 MR. LOCKERBY: There's also a privilege 12 log that reflects the basis for the redaction and 13 it's been the subject of extensive correspondence and 14 meet-and-confer sessions. 15 Q. Were you providing legal advice to 16 these -- to Messrs. Johnson and Churchwell? 17 A. I have no earthly idea, and it doesn't 18 refresh my recollection looking at this document. 19 That's why I have no earthly idea. 20 MR. TEPE: We can go off the record. 21 Provably a good time for lunch. 22 MR. LOCKERBY: That's fine. 23 VIDEO SPECIALIST: We are off the record, 24 12:30. 25 (Proceedings recessed)</p>	<p style="text-align: right;">Page 131</p> <p>1 AFTERNOON SESSION 2 (Eli L. Evans, Esq., Foley &amp; Lardner, now present) 3 VIDEO SPECIALIST: We are back on the 4 record, 1:18. 5 EXAMINATION (continued) 6 BY MR. TEPE: 7 Q. Mr. Adams, as PILF's president, you were 8 engaged in PILF's fundraising activities, correct? 9 A. Correct. 10 Q. You get reports on fundraising results? 11 A. No. 12 Q. Who gets those results? 13 A. There are no reports. 14 Q. Okay. Do you get any indication as to how 15 much money PILF raises? 16 A. Yes. 17 Q. And how do you get those indications? 18 A. It's on our 990s. It's in our budget. 19 Q. But how does those dollar figures actually 20 get into your budget? 21 A. They show up as donations. 22 Q. Well, let me -- let me give you -- maybe 23 it will be easier to get concrete on this. PILF 24 sends some mass solicitations via postal mail; is 25 that right?</p>
<p style="text-align: right;">Page 132</p> <p>1 A. There are direct mail mailings. 2 Q. When someone sends back a donation in 3 response to one of those mailings, what happens to 4 that check? 5 A. It's deposited into our account. 6 Q. And is there a record kept as to Jane Doe 7 sending a donation of X amount of dollars? 8 A. The list of our donors is kept. 9 Q. And to track the, I guess, the success of 10 your -- or lack thereof -- of your various mailings, 11 is there an indication that Jane Doe responded to 12 this solicitation? 13 A. No. 14 Q. Who is the most knowledgeable about PILF's 15 fundraising activities? 16 A. Me. 17 Q. And so if I understand your testimony, 18 there's no tracking of whether certain solicitations 19 generate a donation; is that your testimony? 20 A. Right. 21 Q. In addition to postal mailings, you also 22 send out mass email soliciting donations; is that 23 right? 24 A. Well, I quibble with the term "mass 25 emails" in some context, but there are efforts to</p>	<p style="text-align: right;">Page 133</p> <p>1 raise money by email. 2 Q. Does PILF do fundraising events? 3 A. Such as? 4 Q. Any type of event-based fundraising, I 5 don't know, a dinner, for example. 6 A. No, we do not do a dinner. 7 Q. Do you do any other -- dinner is just an 8 example. I don't want to be narrowly focused on 9 that, but are there other events that generate 10 donations to PILF? 11 A. Okay. I'm not sure I understand the 12 question. I understand it could mean a dinner. I 13 answered no. 14 Do you have something specific -- I've 15 answered no to the broader question, so if you have 16 something specific you want to ask about. 17 Q. I'll go this way. What are the methods 18 that PILF employs to raise funds? We covered two, 19 right? 20 A. What were those two? 21 Q. Postal mail, emails. 22 A. Okay. 23 Q. What are the other methods used by PILF to 24 raise funds? 25 A. We also seek funds from individual donors.</p>

<p style="text-align: right;">Page 134</p> <p>1 Q. And how do you do that?</p> <p>2 A. In person.</p> <p>3 Q. Other than the postal mail and the email</p> <p>4 and the individual solicitations, are there other</p> <p>5 methods PILF employs to raise funds?</p> <p>6 A. We seek donations from institutional</p> <p>7 sources.</p> <p>8 Q. Are these foundations, for example?</p> <p>9 A. We have been funded by some foundations.</p> <p>10 MR. LOCKERBY: I'm going to register a</p> <p>11 standing objection to the relevancy of this line of</p> <p>12 questioning and also counsel the witness, although I</p> <p>13 doubt he needs such counseling, that disclosing</p> <p>14 certain donor information potentially could invade</p> <p>15 their First Amendment privileges.</p> <p>16 Q. Are the institutional donations -- strike</p> <p>17 that.</p> <p>18 Are the donations from institutional sources</p> <p>19 sometimes referred to as grants?</p> <p>20 A. I'm not sure. I don't think I remember</p> <p>21 seeing them -- I mean, generally speaking -- let me</p> <p>22 put it this way. I'll answer in my own capacity. I</p> <p>23 don't remember using that term.</p> <p>24 Q. That term is sometimes used in some of the</p> <p>25 reporting on the 990, for example. That's why I</p>	<p style="text-align: right;">Page 135</p> <p>1 asked.</p> <p>2 A. Well, if it's on the 990, you can show it</p> <p>3 to me and I can answer questions about it, to the</p> <p>4 extent I can.</p> <p>5 Q. So we've talked about three methods.</p> <p>6 Individual solicitations, and those could either be</p> <p>7 to individual people or to institutions, correct?</p> <p>8 A. Okay. I think I've already answered that.</p> <p>9 I'm not going to go any further on that.</p> <p>10 Q. The answer is, yes, the individual</p> <p>11 solicitations could either go to an individual person</p> <p>12 or to an institution.</p> <p>13 A. Right. My attorney has made it clear that</p> <p>14 I'm to be cognizant of the boundaries of a privilege</p> <p>15 asserted in this case, and the identity of donors is</p> <p>16 not something I'm going to testify about.</p> <p>17 Q. Understood. And I'm not asking for that.</p> <p>18 I'm just asking for the methodology -- like the</p> <p>19 methods that you use to raise funds. One is postal</p> <p>20 mailings, correct?</p> <p>21 A. I've testified to that.</p> <p>22 Q. The other is emails, correct?</p> <p>23 A. I stand on my earlier testimony.</p> <p>24 Q. And the third is individual solicitations,</p> <p>25 correct?</p>
<p style="text-align: right;">Page 136</p> <p>1 A. I stand on my earlier testimony.</p> <p>2 Q. And individual solicitations can either be</p> <p>3 a solicitation of an individual person or an</p> <p>4 individual institution, correct?</p> <p>5 A. In theory, yes. Hypothetically, when you</p> <p>6 solicit money from an individual, it could be</p> <p>7 directed toward, in theory, a multiple of different</p> <p>8 types of entities.</p> <p>9 Q. Are there other methods that, other than</p> <p>10 those three that we just discussed, are there other</p> <p>11 methods that PILF employs to raise funds?</p> <p>12 A. Well, as I sit here in my individual</p> <p>13 capacity, I can't think of any right now off the top</p> <p>14 of my head. There could be, but I just don't know of</p> <p>15 any.</p> <p>16 Q. You said you're the most knowledgeable</p> <p>17 about PILF's fundraising activities, correct?</p> <p>18 A. That's right. Doesn't mean that I might</p> <p>19 have -- might not have forgotten something.</p> <p>20 Q. When PILF was sued in this case that</p> <p>21 you're sitting in deposition for, PILF's board</p> <p>22 thought it was a, quote, fundraising opportunity,</p> <p>23 yes?</p> <p>24 A. I can't speak for the board and I can't</p> <p>25 speak for the corporation sitting here either. That</p>	<p style="text-align: right;">Page 137</p> <p>1 was last week.</p> <p>2 Q. Actually you can speak for the corporation</p> <p>3 because you're its president.</p> <p>4 A. Doesn't mean I can speak for it in</p> <p>5 30(b)(6) capacity. I can tell you what I think about</p> <p>6 it personally but not as the corporation. That was a</p> <p>7 good question for last Thursday.</p> <p>8 Q. Well, as we discussed with your counsel,</p> <p>9 topics that were not able to be covered on Thursday,</p> <p>10 we could cover today.</p> <p>11 MR. LOCKERBY: You need to clearly</p> <p>12 delineate that it's a 30(b)(6) question, and then it</p> <p>13 would come out of the time for the individual</p> <p>14 deposition, as I offered.</p> <p>15 MR. TEPE: Okay. Well, then I'll ask the</p> <p>16 following questions in your 30(b)(6) capacity.</p> <p>17 Q. When PILF was sued in this case, PILF's</p> <p>18 board thought it was a fundraising opportunity, yes?</p> <p>19 A. I don't remember that. If you have a</p> <p>20 document to refresh my recollection ...</p> <p>21 (Adams Exhibit 26 marked for</p> <p>22 identification: Email correspondence</p> <p>23 from (topmost) C Adams sent</p> <p>24 4/13/2018</p> <p>25 PILF-ADAMS-0018016 - 0018017)</p>

<p style="text-align: right;">Page 138</p> <p>1 Q. Exhibit 26 has been handed to you with the 2 Bates number 18016. Do you see that? 3 A. I see that. 4 Q. Do you recognize this document? 5 A. I don't, but I'm getting more acquainted 6 with it as I read it. 7 All right. I've read the document. 8 Q. It begins with an email from an Ann C. 9 Fitzgerald to you, April 12th; is that right? 10 A. It does begin that way. 11 Q. And she wrote, "Do you want to catch up by 12 phone? I heard about the lawsuit, a fundraising 13 opportunity, if nothing else." Do you see that? 14 A. It says that. 15 Q. Who is Ann C. Fitzgerald? 16 A. Ann C. Fitzgerald is a president of, as it 17 indicates on the document, of AC Fitzgerald &amp; 18 Associates. 19 Q. What does she do? 20 A. She runs a company called AC Fitzgerald &amp; 21 Associates. 22 Q. And what does she do when she's running 23 the company called AC Fitzgerald &amp; Associates? 24 MR. LOCKERBY: Object to the form, lack of 25 foundation.</p>	<p style="text-align: right;">Page 139</p> <p>1 A. I don't have a foundation to answer that 2 question. 3 Q. You hired her, did you not, PILF, that is? 4 A. Yes. 5 Q. Yes, and what did you hire Ann C. 6 Fitzgerald to do? 7 A. She provides us advice about fundraising. 8 What she does for other companies I can't speak to. 9 Q. What type of advice does she provide PILF? 10 A. Well, on April 12th, 2018 she provided the 11 advice that this lawsuit would be a fundraising 12 opportunity for PILF, as one example. 13 Q. What other type of advice does she provide 14 PILF? 15 A. Well, on April 12th, she also provided an 16 offer to talk by phone because she had heard about 17 the lawsuit with an exclamation point. 18 Q. Yes. My question is, other than what she 19 advises here in this email of April 12th, my question 20 is what other type of advice does she provide PILF? 21 A. Well, on April 13th she provided the 22 advice that she thought there should be a direct mail 23 letter to low-dollar donors, the general theme is 24 we're being attacked -- which should be attacked, I 25 think -- because we must be doing something right.</p>
<p style="text-align: right;">Page 140</p> <p>1 The work of PILF so threatens the left that they are 2 suing us. 3 On April 13th she also provided the advice to 4 do a special letter sent to high-dollar donors, 5 depending on the number, maybe even via Express Mail 6 or FedEx. General idea, excuse the urgency of this 7 letter, but I need to alert you right away, PILF is 8 being sued by LULAC simply because we've been 9 fighting for voter integrity XXX. 10 This frivolous lawsuit will cost PILF 11 \$XX or more, the money we could have used to continue 12 our fight against illegal voting practices, and 13 that's the aim of the liberals, detract and deter 14 PILF from its mission. I assure you we will not be 15 deterred, but we need your help, et cetera. The 16 letter will have a reply form and stamped reply 17 envelope. 18 On April 13th she also provided the advice, 19 possibly offer to set up a follow-up call with 20 high-dollar donors to give them additional details 21 about the lawsuit. On April 13th, she also provided 22 the advice, we can help and wordsmith this, but 23 that's the idea, and I think we can do several other 24 mailings. That was the extent of her additional 25 advice.</p>	<p style="text-align: right;">Page 141</p> <p>1 Q. Mr. Adams, you just read through a portion 2 of the email from Ann C. Fitzgerald -- actually not a 3 portion. You read through the entire email of Ann C. 4 Fitzgerald on April 13th, right? 5 A. No. I skipped the portion that said, "I 6 knew you were doing an email, but I think you could 7 do a couple other things," as I recall. 8 Q. So other than the advice that she provides 9 in the email exhibit in front of you, what kind of 10 advice does she provide PILF? 11 A. Well, if you have additional emails of her 12 providing advice to refresh my recollection, I'm more 13 than happy to take a look at those. 14 Q. You testified before that you're the most 15 knowledgeable person with respect to fundraising at 16 PILF, correct? 17 A. That's not inconsistent with what I just 18 said. 19 Q. And you have no recollection other than 20 the document in front of you as to the services 21 Ms. Fitzgerald provides PILF. 22 A. That's not what my testimony was. 23 Q. I understand. I'm trying to understand 24 the scope of your knowledge as to the advice that 25 Ms. Fitzgerald provides PILF.</p>

<p style="text-align: right;">Page 142</p> <p>1 A. Is there a question?</p> <p>2 Q. So the question, sir, is, other than what</p> <p>3 is in front of you in this exhibit, what kind of</p> <p>4 advice does Ms. Fitzgerald provide PILF?</p> <p>5 A. She provides advice to PILF of a similar</p> <p>6 nature of the sort you see in Exhibit 26.</p> <p>7 Q. So in response to Ms. Fitzgerald's April</p> <p>8 12th email in which she says, "a fundraising</p> <p>9 opportunity, if nothing else," you responded to her,</p> <p>10 correct?</p> <p>11 A. I did respond to her, according to</p> <p>12 Deposition Exhibit 26.</p> <p>13 Q. And in your response you said, "my board</p> <p>14 members had the same reaction as you, a fundraising</p> <p>15 opportunity," correct?</p> <p>16 A. It says that in the email.</p> <p>17 Q. So, presumably, you had some basis as to</p> <p>18 the thinking of board members, correct?</p> <p>19 A. Well, I think I wouldn't have written that</p> <p>20 if I didn't have some basis.</p> <p>21 Q. And the thinking of board members was that</p> <p>22 the lawsuit provided a fundraising opportunity,</p> <p>23 correct?</p> <p>24 MR. LOCKERBY: I'm going to register an</p> <p>25 objection. Defendants have objected generally to</p>	<p style="text-align: right;">Page 143</p> <p>1 communications with board members, but subject to the</p> <p>2 objection and subject to the extent that</p> <p>3 communications with board members have been shared</p> <p>4 outside the organization, there would be no problem</p> <p>5 with the witness answering that question or that --</p> <p>6 questions along those lines.</p> <p>7 MR. TEPE: I don't understand the</p> <p>8 objection, but perhaps the witness can answer the</p> <p>9 question.</p> <p>10 Q. The question was, the thinking of board</p> <p>11 members was that the lawsuit provided a fundraising</p> <p>12 opportunity, correct?</p> <p>13 A. Well, I don't know, except to the extent</p> <p>14 that this document refreshes my recollection that</p> <p>15 there was some thinking along those lines.</p> <p>16 Q. And what was the basis for that thinking</p> <p>17 that this provided a fundraising opportunity?</p> <p>18 A. You've got me there, because I don't</p> <p>19 remember.</p> <p>20 Q. Ms. Fitzgerald responds with a couple of</p> <p>21 pieces of advice, and you read those pieces of advice</p> <p>22 a few minutes ago, correct?</p> <p>23 A. On April 13th she responds with the</p> <p>24 suggestions that I read when you asked me what other</p> <p>25 advice besides April 12th she gave.</p>
<p style="text-align: right;">Page 144</p> <p>1 Q. And she advised direct mail letter to the</p> <p>2 low-dollar donors. Do you see that?</p> <p>3 A. I can read that. It says that.</p> <p>4 Q. And what is a low-dollar donor?</p> <p>5 A. I don't know what she meant by that. I</p> <p>6 can tell you what I think that means.</p> <p>7 Q. What do you think that means?</p> <p>8 A. It means somebody who has given a small</p> <p>9 amount of money.</p> <p>10 Q. What's a small amount?</p> <p>11 A. I don't have a boundary on that at all</p> <p>12 that I've ever considered, not even right now.</p> <p>13 Q. A million dollars, is that small?</p> <p>14 A. Certainly not.</p> <p>15 Q. A special letter sent to high-dollar</p> <p>16 donors was another recommendation of hers, correct?</p> <p>17 A. I've already testified, when you asked me</p> <p>18 what advice did she give besides the April 12th</p> <p>19 advice, I included that advice in her April 13th</p> <p>20 email.</p> <p>21 Q. What is a high-dollar donor to your</p> <p>22 understanding?</p> <p>23 A. Maybe one who gives a million dollars.</p> <p>24 Q. What about a thousand dollars?</p> <p>25 A. That one is a hard one. I don't have a</p>	<p style="text-align: right;">Page 145</p> <p>1 view about that as a 30(b)(6) deponent.</p> <p>2 Q. Five thousand dollars?</p> <p>3 A. Don't have a view about that.</p> <p>4 Q. Well, presumably, you would have to have</p> <p>5 some view as to what constitutes a high-dollar donor</p> <p>6 in order to send a special letter to them, correct?</p> <p>7 MR. LOCKERBY: Object to the form.</p> <p>8 A. I don't understand the question.</p> <p>9 Q. Well, if you're coming up with a mailing</p> <p>10 list for this special letter that is recommended</p> <p>11 here, would you send that letter to someone who</p> <p>12 previously donated \$5,000?</p> <p>13 A. Well, there's multiple letters suggested.</p> <p>14 So it would seem to capture --</p> <p>15 Q. And I'm asking about the special letter</p> <p>16 sent to high-dollar donors.</p> <p>17 A. Right. I don't know. You notice there's</p> <p>18 some Xs in there.</p> <p>19 Q. And then the third bullet is, "possibly</p> <p>20 offer to set up a follow-up call with the high-dollar</p> <p>21 donors to give them additional details about the</p> <p>22 lawsuit." Do you see that?</p> <p>23 A. Well, when you ask me what advice did she</p> <p>24 give besides on April 12th, I read that into the</p> <p>25 record.</p>

1 Q. Yes. And what phone calls would have been  
2 made if you don't know who the high-dollar donors  
3 are?

4 A. There are no lines of demarcation in this  
5 document as to what is a low-dollar donor or a  
6 high-dollar donor.

7 Q. I understand.

8 A. So I'm not going to make one here.

9 Q. That's why I'm asking that question as to  
10 beyond this particular document, what is a  
11 high-dollar donor?

12 A. That is an undefined categorization used  
13 by a third party.

14 Q. Right. A third party working for you to  
15 help you raise money. And so my question is: Who is  
16 a high-dollar donor?

17 A. And I've answered that question.

18 Q. In PILF's perspective, you don't know what  
19 a high-dollar donor is?

20 A. I've answered that question.

21 Q. Just to make sure I understand, your  
22 testimony is PILF does not know what a high-dollar  
23 donor is.

24 A. I stand on my previous testimony.

25 Q. Sir, my question is, and I have not asked

1 this question before -- I've asked other questions --  
2 but my question is: Is it your testimony that PILF  
3 does not know what a high-dollar donor is?

4 A. This is the last time I'm going to answer  
5 this question. There is no definition of a  
6 high-dollar donor at PILF.

7 (Adams Exhibit 27 marked for  
8 identification: Email correspondence  
9 from (topmost) D Kulivan sent  
10 5/31/2018

11 PILF-ADAMS-0018001 - 0018002)

12 Q. The court reporter has marked as Exhibit  
13 27 a document with the Bates number 18001.

14 This is an email chain that begins with an  
15 email from Shawna Powell to David Kulivan, correct?

16 A. That's what the document says.

17 Q. It's dated May -- excuse me, May 30th --  
18 2018, and she writes, "David, we now have info we can  
19 provide to our large donors/foundations re the LULAC  
20 suit." Do you see that?

21 A. The document says that.

22 Q. And you did provide information to large  
23 donors/foundations, as indicated here by Ms. Powell,  
24 correct?

25 MR. LOCKERBY: Object to the form.

1 MR. TEPE: What's the objection?

2 MR. LOCKERBY: Well, the "you" is  
3 undefined.

4 MR. TEPE: PILF. This is 30(b)(6)  
5 capacity.

6 A. So we're still on the 30(b)(6)?

7 Q. Yes.

8 A. I don't know the answer to that right now.

9 Q. Do you know in your personal capacity?

10 A. Well, no, I don't. And I don't know in my  
11 corporate capacity, because I didn't think that you  
12 were going to be going back in, so I didn't refresh  
13 my recollection about this. More than likely --  
14 well, I'm not going to speculate.

15 Q. You did provide information to large  
16 donors/foundations regarding the LULAC lawsuit,  
17 correct?

18 A. I'm not going to talk about our  
19 communications with donors.

20 Q. I'm not asking about the content of  
21 communications, sir. I'm asking whether or not you  
22 did in fact provided information to large  
23 donors/foundations regarding the LULAC lawsuit?

24 A. Right, and I'm telling you I don't  
25 remember.

1 Q. You don't remember.

2 MR. LOCKERBY: Objection. Is there a  
3 question?

4 Q. You're the most knowledgeable person about  
5 fundraising at PILF, and you don't remember if PILF  
6 provided information to large donors/foundations  
7 regarding the instant lawsuit. That's your  
8 testimony.

9 MR. LOCKERBY: Object to the form.

10 A. Your question was something different. It  
11 was about a letter with attachments. It was about  
12 this document.

13 Q. No, wrong.

14 A. Well, then ask it again.

15 Q. My question was: Did you provide  
16 information to large donors/foundations regarding the  
17 LULAC lawsuit?

18 A. Well, I don't understand the question,  
19 because I don't know what the line of demarcation is  
20 about large donors, for one. There's no line of  
21 demarcation. The answer is some information was  
22 provided about the lawsuit to some donors.

23 Q. And would some donors include large  
24 donors/foundations?

25 A. I don't understand the question. What is

<p style="text-align: right;">Page 150</p> <p>1 a large donor? And I can answer your question 2 possibly. 3 Q. Well, this is the words of Ms. Powell, who 4 is the secretary of PILF, correct? 5 A. That's what she wrote. 6 Q. Ms. Powell, in this email here, when she 7 says, "we now have info we can provide to our large 8 donors," she's referring to the special letter sent 9 to high-dollar donors that was recommended by Ann C. 10 Fitzgerald in the previous exhibit, correct? 11 MR. LOCKERBY: Object to the form. 12 A. She could be referring to that which is 13 redacted. I don't know, as I sit here right now. 14 Q. Well, presumably, she's not talking about 15 a direct mail letter to low-dollar donors, correct? 16 A. I can't speculate. 17 Q. Do you need to speculate as the president 18 of PILF and the most knowledgeable person about 19 PILF's fundraising? 20 A. I do need to account for the possibility 21 that what's redacted is the answer to your question, 22 and that requires a measure of speculation because I 23 cannot remember what's redacted. 24 Q. And so just to make sure I understand, 25 your testimony today is that you have no recollection</p>	<p style="text-align: right;">Page 151</p> <p>1 as to whether or not PILF provided information about 2 the LULAC lawsuit to, quote, large 3 donors/foundations? 4 A. Well -- 5 MR. LOCKERBY: Object to the form. 6 A. Right, I objected to the confusing nature 7 of the large. If you would ask the question without 8 that element to it, I have already answered that 9 question, and the answer was that is what the 10 transcript states. 11 MR. TEPE: Move to strike as 12 nonresponsive. 13 Q. So, again, your testimony today is that 14 you have no recollection as to whether or not PILF 15 provided information about the LULAC lawsuit to, 16 quote, large donors/foundations. 17 MR. LOCKERBY: Object to the form. 18 Q. Is that right? 19 A. I don't understand the question, for one, 20 and to the extent it did not involve large donors, 21 I've already answered it. 22 Q. The answer is, yes, you have provided 23 information to donors/foundations regarding the LULAC 24 lawsuit. 25 A. The answer is we have provided information</p>
<p style="text-align: right;">Page 152</p> <p>1 to some donors about the lawsuit. 2 Q. And the outreach to these donors netted 3 PILF some money, correct? 4 MR. LOCKERBY: Object to the form of the 5 question. 6 A. I don't think it netted any money. 7 Q. Are you saying that the information 8 provided to some donors of some size regarding the 9 LULAC lawsuit yielded zero dollars? 10 A. Saying it's awfully close to that. That 11 was the testimony last week when you asked this 12 question, and I'm answering it a second time. This 13 is the second time you've asked a 30(b)(6) question 14 on this topic. 15 Q. And, yes, I believe your answer last time 16 was "next to nothing." 17 A. There you go. You have it in the 18 transcript. 19 Q. And "next to nothing" is not nothing, 20 correct? 21 A. I won't quibble with your 22 characterization. 23 Q. And so how much money did PILF raise from 24 donors of any size based on solicitations invoking 25 the LULAC lawsuit?</p>	<p style="text-align: right;">Page 153</p> <p>1 A. Next to nothing. 2 Q. How much money in dollar amounts did PILF 3 raise from donors invoking the LULAC lawsuit? 4 A. I don't have that exact number. My 5 understanding of it is it's less than a hundred 6 dollars. 7 Q. So these large donors/foundations did not 8 help out PILF at all, basically; is that your 9 testimony? 10 A. That's an incredibly confusing question. 11 "Help out PILF at all, basically" is not something 12 that any deponent would understand. 13 Q. Well, so how much money do you spend on 14 the services of AC Fitzgerald? 15 A. I'm not sure I'm going to answer that 16 because I don't know. 17 Q. Is it more than a hundred dollars? 18 A. More than a hundred dollars ever? Yes. 19 Q. Do you have a yearly contract with AC 20 Fitzgerald? 21 A. No. 22 Q. Do you have a retainer with her? 23 A. Yes. 24 Q. Okay. How much is the retainer worth? 25 A. Again, I don't know. I answered that.</p>



Q. Is it above a hundred dollars?

A. Yes. I've answered that.

Q. So have you fired AC Fitzgerald?

A. I don't understand the question. Have I fired AC Fitzgerald?

Q. Well, one of the recommendations of Ann C. Fitzgerald was a special letter to high-dollar donors, right? We've already established that, correct?

A. What does that have to do with firing her?

Q. We established that that was one of her recommendations, right?

A. The document speaks for itself. I think we spent some time on discussing her April 12th and April 13 advice.

Q. Right. And so --

A. Go ahead.

Q. -- and so your testimony is that her recommendation for a special outreach to large donors/foundations was a failure, correct?

A. No, it isn't my testimony.

Q. Well --

A. This is argumentative. This is -- this is argumentative, and you're characterizing testimony I never gave. I mean, that's -- that's just low.

Q. I'm trying to understand. So your testimony is that, in response to solicitations of high-dollar donors and foundations invoking the LULAC lawsuit --

A. What document are you referring to?

Q. I'm not referring to a document. I'm asking a question.

A. What is the question?

Q. I'll restate it. So your testimony is that, in response to solicitations of high-dollar donors/foundations invoking the LULAC lawsuit, PILF raised less than one hundred dollars.

A. What was that meaning -- you just made a hand gesture. Was that --

Q. I'm --

A. Okay.

Q. No, that was nothing.

A. I thought maybe you were demanding a quicker response.

Q. No. My arms were completely still.

A. Right. Okay. You just asked a question that misrepresented the evidence. Deposition Exhibit 26, as far as I can tell -- and I'm perfectly willing to be pointed out as incorrect -- never uses one time the word "solicitation."

Now, again, I stand ready to be corrected, but you mischaracterized the evidence.

Q. Do you not understand that asking for money in a fundraising capacity is often called a solicitation?

A. Could you show me perhaps where in the email of April 13th it suggests asking for money?

MR. LOCKERBY: I'm going to object to the form of the question. At this point it might almost be easier if counsel could start over with a new question rather than having us debate on the record what the email says and doesn't say.

Q. Well, I think we already established that Ann C. Fitzgerald heard about the lawsuit, correct?

A. She heard about the lawsuit.

Q. And she said "a fundraising opportunity, if nothing else," correct?

A. She did say that.

Q. And you said, "my board members had the same reaction as you, a fundraising opportunity," correct?

A. That's what the email says that I wrote.

Q. And then Ms. Fitzgerald says, "I know you were doing an email, but I think you could do a couple of other things." Do you see that?

A. Yeah, a couple of other things being an important pivot point that you missed on all of your earlier questions.

Q. And one of those other things is a special letter sent to high-dollar donors, correct?

A. That is one of the things listed in her advice of April 13th.

Q. Okay. And then we looked at the Exhibit 27 involving communication between Ms. Powell and Mr. Kulivan, who is also with AC Fitzgerald, correct?

A. Your question is who is Mr. Kulivan with or was it --

Q. Mr. Kulivan is with AC Fitzgerald.

A. Correct.

Q. And if you then go to Exhibit 27, Ms. Powell said, "David, we now have info we can provide to our large donors/foundations regarding the LULAC lawsuit." Do you see that?

A. She does say that.

Q. Okay. And so my question, which has not been answered is: Is it your testimony that solicitations or fundraising letters sent to high-dollar donors/foundations that invoked the LULAC lawsuit yielded less than one hundred dollars?

A. Well, I'd be excepting the premise that

1 they even existed, and so that's the first thing that  
2 supports my testimony, and the second thing is, if  
3 they did exist, they yielded next to nothing.

4 Q. And so is your testimony no longer that it  
5 yielded less than a hundred dollars?

6 A. Look, I've given you my best recollection,  
7 as I sit here today. You didn't like any of them.  
8 You want to find inconsistencies between them.

9 I've told you it's next to nothing; I've told  
10 you it's less than a hundred dollars; I've told you  
11 it's an insubstantial amount of money. That's three  
12 different ways I can say the same thing.

13 Q. But it did net you some money.

14 A. I'm not sure.

15 Q. So are we -- is it now back to zero?

16 A. You're arguing with me now.

17 (Adams Exhibit 28 marked for  
18 identification: Email correspondence  
19 from (topmost) D Kulivan sent  
20 5/1/2018

21 PILF-ADAMS-0018006 - 0018007)

22 Q. The court reporter has marked as Exhibit  
23 28 a document with the beginning Bates number of  
24 18006. Do you recognize this document?

25 A. I have Deposition Exhibit 28 in front of

1 me and I see it.

2 Q. It's an email from David Kulivan dated May  
3 1st, 2018; is that right?

4 A. That's what it says.

5 Q. To you and Ms. Powell.

6 A. Right.

7 Q. With a call agenda.

8 A. It says there's a call agenda attached.

9 Q. And then if you go to the attached, there  
10 is redacted the contents of an agenda between David  
11 Kulivan, yourself and Ms. Powell; is that right?

12 A. It says it's an agenda with redactions.

13 Q. Above the redactions it says, "updates on  
14 LULAC lawsuit," and then a bullet, "Do you have a  
15 green light to discuss with top donors yet?"

16 A. That's what the document says.

17 Q. Do you know what kind of information was  
18 redacted? I'm not asking for the content, just  
19 generally.

20 A. I have a general understanding of the  
21 nature of information that would have been redacted.

22 MR. LOCKERBY: And I'm going to register  
23 an objection. That's set forth in detail on a  
24 privilege log.

25 (Adams Exhibit 29 marked for

1 identification: Email correspondence  
2 from (topmost) S Powell sent  
3 4/13/2018

4 PILF-ADAMS-0040864 - 0040865)

5 Q. The court reporter has marked as Exhibit  
6 29 a document with the Bates number 40864. Do you  
7 recognize this?

8 A. I'm reading this, 29. I've read 29.

9 Q. And attached to the -- well, it's an email  
10 that started with David Kulivan to Ms. Powell on  
11 April 13th, 2018; is that right?

12 A. Wait. I'm sorry. It was an email that  
13 was from David Kulivan to Powell.

14 Q. Right, initially. And then Ms. Powell  
15 forwarded that email to you at 1:36 p.m. on April  
16 13th, right?

17 A. That's what the document says.

18 Q. And --

19 A. Well, she forwarded something to me, the  
20 attachment, which I presume is this second page of  
21 Exhibit 29.

22 Q. Right. And then in the body she says,  
23 "Final of LULAC v. PILF email, appeal for your  
24 approval/edits," right?

25 A. The document says that.

1 Q. And then the attachment is a copy of that  
2 appeal, yes?

3 A. No. A copy --

4 Q. A draft.

5 A. Thank you. There's a difference.

6 Q. Indeed. And so this is a draft what  
7 Ms. Powell calls appeal, what I would call  
8 solicitation, but that draft is attached to the  
9 email, yes?

10 A. It appears to be from this exhibit.

11 Q. Right. And then so the draft has a  
12 proposed subject line, "Soros-Funded Group Sues  
13 PILF."

14 A. That's on document 29.

15 Q. What's the reason for pointing out George  
16 Soros?

17 A. In this document?

18 Q. Yes.

19 A. Well, because the Plaintiffs in this case,  
20 at least their national entity, has received funding  
21 from Open Society Institute, which is a Soros-funded  
22 and managed operation.

23 So the fact that they have been funded by  
24 these funding sources has relevance to the merits,  
25 relevance to the purpose, relevance to the intent,

<p style="text-align: right;">Page 162</p> <p>1 relevance to the funding and resources involved. It</p> <p>2 has multiple facets of relevance to the people who</p> <p>3 would receive this email.</p> <p>4 And, again, you just made a gesture.</p> <p>5 Q. No, what I'm doing is I'm, like, moving my</p> <p>6 hand, so --</p> <p>7 A. With an expression.</p> <p>8 Q. My hand movement was because I was about</p> <p>9 to ask another question, which is -- and I'm an</p> <p>10 expressive person; I apologize for that, Mr. Adams --</p> <p>11 but my question is: What's the reason for calling</p> <p>12 out George Soros as purportedly a funder of the</p> <p>13 national LULAC organization?</p> <p>14 A. I just provided an answer in your previous</p> <p>15 question for why that is, and I stand by that</p> <p>16 testimony.</p> <p>17 Q. Is there something wrong with the Open</p> <p>18 Society Institute?</p> <p>19 A. Well, what do you mean by "wrong"?</p> <p>20 Q. Well, you said in your previous answer</p> <p>21 that LULAC national, who is not a plaintiff in this</p> <p>22 case, has received funding from the Open Society</p> <p>23 Institute, correct?</p> <p>24 A. That was in my answer, correct, and -- and</p> <p>25 you preclude the possibility that the Plaintiff has</p>	<p style="text-align: right;">Page 163</p> <p>1 received funding in that answer.</p> <p>2 Q. But you have no basis for saying that.</p> <p>3 A. Not yet.</p> <p>4 Q. And then you say, "the Open Society</p> <p>5 Institute is a Soros-funded and managed operation,"</p> <p>6 right?</p> <p>7 A. It's a factual statement.</p> <p>8 Q. Okay. So what is the relevance of George</p> <p>9 Soros donating or George Soros's Open Society</p> <p>10 Institute donating money to LULAC national?</p> <p>11 A. Well, I've testified to that.</p> <p>12 Q. No, you said that it has relevance.</p> <p>13 A. And I gave you examples of why.</p> <p>14 Q. Well, you said it has relevance to the</p> <p>15 merits. How so?</p> <p>16 A. Well, because -- because the Soros-funded</p> <p>17 lawsuits like exist around the country will</p> <p>18 frequently be brought on flimsy foundations in order</p> <p>19 to make a broader ideological or political point, and</p> <p>20 that's happening all over the country right now,</p> <p>21 whether it involves immigration, whether it involves</p> <p>22 voting, or a wide variety of things.</p> <p>23 So if Soros is funding the effort, it</p> <p>24 frequently is less about the merits of the case but</p> <p>25 more about the broader ideological warfare, which is</p>
<p style="text-align: right;">Page 164</p> <p>1 exactly what I characterize and consider this case to</p> <p>2 be. Otherwise, you would have resolved this a long</p> <p>3 time ago. There are other reasons.</p> <p>4 Q. This proposed appeal has links to the</p> <p>5 Alien Invasion reports, correct?</p> <p>6 A. The draft appears to.</p> <p>7 Q. And this email appeal was sent, yes?</p> <p>8 A. If you have a document to refresh my</p> <p>9 recollection, it would be helpful, because right now</p> <p>10 I can't remember.</p> <p>11 (Adams Exhibit 30 marked for</p> <p>12 identification: Email correspondence</p> <p>13 from (topmost) C Adams sent</p> <p>14 4/13/2018</p> <p>15 PILF-ADAMS-0017674 - 0017677)</p> <p>16 Q. The court reporter has marked as Exhibit</p> <p>17 30 a document with Bates number 17674. Do you</p> <p>18 recognize this document?</p> <p>19 A. Exhibit 30, I've looked at.</p> <p>20 Q. And this is a final version of the email</p> <p>21 appeal that we looked at in draft form in Exhibit 29,</p> <p>22 correct?</p> <p>23 A. It could be. It could not -- also might</p> <p>24 not be.</p> <p>25 Q. Do you want to take a look?</p>	<p style="text-align: right;">Page 165</p> <p>1 A. Well, I'm looking at it right now.</p> <p>2 There's no way to tell.</p> <p>3 Q. Well, you can compare the two, right?</p> <p>4 A. Well, but your question was, was this the</p> <p>5 final, final email, and this might not be the final</p> <p>6 email.</p> <p>7 Q. Well, what makes you say it might not be</p> <p>8 the final email?</p> <p>9 A. Because Shawna Powell routinely sent test</p> <p>10 emails to herself to see how they looked. And so</p> <p>11 there's a prospect -- possibility that this is a test</p> <p>12 email that she sent to herself to see how it looked.</p> <p>13 I can't preclude that as one of the possibilities for</p> <p>14 this document.</p> <p>15 Q. Well, you wouldn't send out a test email</p> <p>16 unless you were planning on sending it out otherwise,</p> <p>17 right?</p> <p>18 A. No, that's not correct. You send the test</p> <p>19 email in order to see if it looks adequate and</p> <p>20 sufficient to send out.</p> <p>21 So you asked me if this was the final email</p> <p>22 that was sent, and the truthful answer is it could be</p> <p>23 but it also might not be.</p> <p>24 Q. But you did send out email solicitations</p> <p>25 citing the LULAC lawsuit, correct?</p>

1 A. Well, you're getting back to the ultimate  
2 question, did this go or not, and I don't remember.

3 Q. No, I'm not asking whether or not this one  
4 went. I'm asking -- you do know that email  
5 solicitations went out invoking the LULAC lawsuit,  
6 correct?

7 A. If you have one to show me, I will opine  
8 about it --

9 Q. No --

10 A. -- or otherwise offer testimony.

11 Q. Sir --

12 A. Probably, but I don't remember.

13 Q. But you're here as a 30(b)(6) witness,  
14 correct?

15 A. A 30(b)(6) witness is going to need their  
16 recollection refreshed also. If you have a document  
17 that will refresh my recollection on what was sent,  
18 I'd be happy to look at it.

19 Q. Well, how would I know what was sent other  
20 than to look at the documents that you produced in  
21 this lawsuit?

22 A. Well, the documents produced in this  
23 lawsuit are not going to necessarily tell you what  
24 was sent.

25 Q. That's why --

1 A. They don't come with a guide.

2 Q. That's why we need the testimony of an  
3 educated 30(b)(6) witness to say yes, indeed, this  
4 was sent.

5 A. Right.

6 Q. And we don't have that here.

7 A. Well --

8 MR. LOCKERBY: Object to the form.

9 A. -- I don't know from the face of Exhibit  
10 30 whether or not this was sent. And I gave you very  
11 specific reasons why I can't make that conclusive  
12 assertion.

13 Q. And then I asked the follow-up question,  
14 which was, it is the case that PILF sent email  
15 solicitations invoking the LULAC lawsuit.

16 A. You showed me an exhibit in last  
17 Thursday's 30(b)(6) that looked different than this  
18 that had more formatting that you asked me questions  
19 about that may be one of those. If you want to bring  
20 that back, that might be one of them.

21 Q. No, what I want is an answer to my  
22 question, which is, it is the case, sir, that PILF  
23 sent out email solicitations invoking the LULAC  
24 lawsuit, yes or no?

25 A. And my testimony is I think you showed me

1 one last week that you haven't shown me today.

2 Q. No, that's not the case, because those  
3 were solicitations invoking the Alien Invasion  
4 reports. I'm now asking you questions about  
5 solicitations invoking the LULAC lawsuit.

6 A. Yeah, I have -- I'm not sure that -- I  
7 don't think there were others.

8 Q. My question again is: It is the case that  
9 PILF sent email solicitations invoking the LULAC  
10 lawsuit, yes?

11 A. I don't think there were.

12 Q. And so it's your testimony that you  
13 believe this (indicating) exhibit, Exhibit 30,  
14 showing an email solicitation invoking the LULAC  
15 lawsuit was not sent.

16 MR. LOCKERBY: Object to the form.

17 A. No. Your question was confusing. This is  
18 a solicitation, one singular solicitation. Your  
19 question was plural, solicitations, which would mean  
20 a different message, a different document, a  
21 different mailing.

22 So my answer has been, if you have a document  
23 to show me, I'll be happy to refresh my recollection  
24 about separate solicitations.

25 (Adams Exhibit 31 marked for

1 identification: Email correspondence  
2 from (topmost) S Powell sent  
3 6/1/2018 with attachment  
4 PILF-ADAMS-0040925 - 0040930)

5 Q. The court reporter has marked as Exhibit  
6 31 a document with the Bates number 40925, correct?  
7 Do you have that in front of you?

8 A. 40925, Exhibit 31, I have it in front of  
9 me.

10 Q. And this begins as an email from Timothy  
11 Webster dated June 1st to Shawna Powell; is that  
12 right?

13 A. The email is, yes.

14 Q. And who is Timothy Webster?

15 A. He is with a group called ForthRight  
16 Strategies.

17 Q. And what is ForthRight Strategy?

18 A. They write letters like the one that is  
19 attached to Deposition Exhibit 31.

20 Q. Mr. Webster said, "Shawna, here's the  
21 house letter." What is a house letter?

22 A. A house letter is something that goes to  
23 donors.

24 Q. What kind of donors?

25 A. House donors.

<p style="text-align: right;">Page 170</p> <p>1 Q. What's a house donor?</p> <p>2 A. It's a donor. It's somebody who donates.</p> <p>3 Q. Does a house donor have a particular</p> <p>4 criteria attached to it?</p> <p>5 A. They're donors.</p> <p>6 Q. So any donor would get this house letter.</p> <p>7 A. Well, I don't agree with that.</p> <p>8 Q. Well, that's what I'm trying to</p> <p>9 understand. Who would get the house letter?</p> <p>10 A. A donor.</p> <p>11 Q. All donors?</p> <p>12 A. No.</p> <p>13 Q. Some donors?</p> <p>14 A. Some donors.</p> <p>15 Q. Who are the some donors?</p> <p>16 A. Ones in the house file.</p> <p>17 Q. You're defining house letter by saying</p> <p>18 they are the ones in the house file, and I'm trying</p> <p>19 to understand who gets the house letter?</p> <p>20 A. Donors who are in the house file.</p> <p>21 Q. And what kind of donors are in the house</p> <p>22 file?</p> <p>23 A. Ones who have previously donated.</p> <p>24 Q. But not all donors are on the house list,</p> <p>25 house file?</p>	<p style="text-align: right;">Page 171</p> <p>1 A. Well, it depends. It depends on whether</p> <p>2 or not they've donated to one of these mailings</p> <p>3 before.</p> <p>4 Q. So once they've donated before, then they</p> <p>5 get on to the house list?</p> <p>6 A. That's what a house file is.</p> <p>7 Q. Well, that's what I'm asking you about.</p> <p>8 A. All right.</p> <p>9 Q. So attached to this is a draft house</p> <p>10 letter, and this letter refers to the LULAC lawsuit,</p> <p>11 yes?</p> <p>12 A. This is the sort of document I was asking</p> <p>13 you for a period of time in my testimony if you had</p> <p>14 to refresh my recollection. The answer is yes, it</p> <p>15 refers back to LULAC lawsuit.</p> <p>16 Q. In the second paragraph, you say -- well,</p> <p>17 strike that.</p> <p>18 The letter says, "I'm writing to tell you that</p> <p>19 we are being sued for our work exposing voter fraud."</p> <p>20 Do you see that?</p> <p>21 A. I can read that in the letter.</p> <p>22 Q. Right. And this letter purports to come</p> <p>23 from you, J. Christian Adams, with the Public</p> <p>24 Interest Legal Foundation, yes?</p> <p>25 A. It purports to come from J. Christian</p>
<p style="text-align: right;">Page 172</p> <p>1 Adams.</p> <p>2 Q. And on page 2 of the draft letter it</p> <p>3 recites some of the findings of Alien Invasion II; is</p> <p>4 that right?</p> <p>5 A. I'm sorry. What does? It does what?</p> <p>6 Could you re-ask it?</p> <p>7 Q. On page 2 of the draft letter it recites</p> <p>8 some of the findings of Alien Invasion II, correct?</p> <p>9 A. Well, I would not characterize this</p> <p>10 necessarily as just a republication of Alien II.</p> <p>11 Q. I didn't ask that.</p> <p>12 A. Well, you said it recites findings.</p> <p>13 Q. Right.</p> <p>14 A. So the implication is it republished those</p> <p>15 findings. And so I'm answering the question, no, I</p> <p>16 would not agree that it necessarily recites findings</p> <p>17 from Alien II.</p> <p>18 Q. Actually my question was, on page 2 of the</p> <p>19 draft letter, it recites some of the findings of</p> <p>20 Alien Invasion II.</p> <p>21 A. And I continue to stand by my testimony</p> <p>22 that some of the findings may not be an accurate</p> <p>23 statement. I don't know because I think there's some</p> <p>24 differences.</p> <p>25 I actually -- there are, there's differences</p>	<p style="text-align: right;">Page 173</p> <p>1 between this letter and the findings of Alien II. So</p> <p>2 the answer to your original question is no.</p> <p>3 Q. So you're saying this letter does not</p> <p>4 recite any findings of Alien Invasion II?</p> <p>5 MR. LOCKERBY: Objection to form.</p> <p>6 A. I didn't say that. You're adding an</p> <p>7 absolute now in your question, the word "any." And</p> <p>8 what I've testified to is this letter -- maybe this</p> <p>9 will clear it up.</p> <p>10 This letter cites facts related to Alien II,</p> <p>11 as far as I can see, sitting here -- and I can be</p> <p>12 corrected -- in a way that is different than Alien II</p> <p>13 recites those facts</p> <p>14 Q. I'm not saying it is identical, but my</p> <p>15 question is, it does cite -- strike that.</p> <p>16 So right here on page 2 of the letter it says,</p> <p>17 "here are some of the very disturbing facts we</p> <p>18 uncovered in our reports." Do you see that?</p> <p>19 A. I see it says that.</p> <p>20 Q. And it says, "Virginia election officials</p> <p>21 quietly removed 5,556 voters from the voter rolls for</p> <p>22 noncitizenship between 2011 and May 2017."</p> <p>23 A. That is an accurate statement that in fact</p> <p>24 that did happen.</p> <p>25 Q. And that's one of the facts or findings</p>

<p style="text-align: right;">Page 174</p> <p>1 published in Alien Invasion II, correct?</p> <p>2 A. In large part, but not entirely.</p> <p>3 Q. And then it also says, one thousand, here</p> <p>4 in the letter, "1,852 of those removed as noncitizens</p> <p>5 cast ballots." Do you see that?</p> <p>6 A. The letter says that.</p> <p>7 Q. And that's also on the findings of Alien</p> <p>8 Invasion II, is it not?</p> <p>9 A. Probably is the number, if I say that's</p> <p>10 exactly the number, but I have no reason to quibble</p> <p>11 with it.</p> <p>12 Q. And the next bullet is, "a total of 7,474</p> <p>13 illegal ballots were cast from the pool of removed</p> <p>14 noncitizens." Do you see that?</p> <p>15 A. It does say that.</p> <p>16 Q. And that was also one of the findings from</p> <p>17 Alien Invasion II, correct?</p> <p>18 A. Again, I think there's some difference</p> <p>19 between Plaintiff's Exhibit -- I think we're on 31 --</p> <p>20 and the language you just read and the findings in</p> <p>21 Alien II.</p> <p>22 Q. So are you saying the letter here to</p> <p>23 donors mischaracterized the findings of Alien</p> <p>24 Invasion II?</p> <p>25 MR. LOCKERBY: Object to the form.</p>	<p style="text-align: right;">Page 175</p> <p>1 A. Nope, not saying that at all.</p> <p>2 Q. Okay. So you would agree that this letter</p> <p>3 recites some of the findings of Alien Invasion II,</p> <p>4 yes?</p> <p>5 A. I won't disagree with you.</p> <p>6 Q. Meaning yes.</p> <p>7 A. No, not meaning yes.</p> <p>8 Q. Well, why do you say I wouldn't disagree</p> <p>9 with you if the meaning is not yes?</p> <p>10 A. Because I don't have a view on that.</p> <p>11 Q. You don't have a view?</p> <p>12 A. I have, but you don't like it. I've told</p> <p>13 you a number of times that I think there's --</p> <p>14 Q. Sir --</p> <p>15 A. If I might finish the question, if it was</p> <p>16 one, and if it wasn't one, let me know that. "You</p> <p>17 don't have a view." Was there a question mark after</p> <p>18 that?</p> <p>19 Q. So the question that was pending is, so</p> <p>20 you would agree that this letter recites some of the</p> <p>21 findings of Alien Invasion II.</p> <p>22 A. I won't disagree with that.</p> <p>23 Q. And my question now is: Why do you phrase</p> <p>24 your answer that way instead of just saying yes?</p> <p>25 MR. LOCKERBY: Object to the form.</p>
<p style="text-align: right;">Page 176</p> <p>1 A. I think there are differences, which I've</p> <p>2 already testified about at least twice in the last</p> <p>3 ten minutes.</p> <p>4 Q. What's the difference between yes and --</p> <p>5 A. You just cut me off.</p> <p>6 Q. I thought you were finished. What's the</p> <p>7 difference between saying I won't disagree with you</p> <p>8 and yes?</p> <p>9 A. I don't know. I think we're so mired down</p> <p>10 in a word game now by this point that there's no way</p> <p>11 to answer the question.</p> <p>12 Q. This mailing was sent, yes?</p> <p>13 A. I doubt it.</p> <p>14 Q. Why?</p> <p>15 A. Because this mailing would have never been</p> <p>16 sent, more than likely, the way it's presented in</p> <p>17 Deposition Exhibit 31.</p> <p>18 Q. That's not my question. My question is</p> <p>19 that -- my question is not would this draft with no</p> <p>20 names in the address block be sent.</p> <p>21 My question is: Did this letter, this draft</p> <p>22 letter, become finalized and sent to donors?</p> <p>23 A. Almost certainly not.</p> <p>24 Q. And why?</p> <p>25 A. Because, to the best of my recollection,</p>	<p style="text-align: right;">Page 177</p> <p>1 it is inconceivable that a draft from ForthRight</p> <p>2 Strategy has ever gone out without significant edits</p> <p>3 being made to it.</p> <p>4 So my testimony is that it is almost certainly</p> <p>5 not the case that the answer to your question was</p> <p>6 yes.</p> <p>7 Q. Okay. So it is the case, though, that an</p> <p>8 edited version of the house letter that we were just</p> <p>9 looking at would have been sent out.</p> <p>10 A. I don't know. There have been times over</p> <p>11 the years where I have absolutely stopped the mailing</p> <p>12 of a draft fundraising letter and said don't send</p> <p>13 this.</p> <p>14 Q. But you don't recall doing that in this</p> <p>15 instance?</p> <p>16 A. Well, this might have been the instance.</p> <p>17 Q. But you don't recall that specifically.</p> <p>18 A. Well, specifically, no, but generally,</p> <p>19 yes. If you have a document that is the letter, I</p> <p>20 can answer that question.</p> <p>21 (Adams Exhibit 32 marked for</p> <p>22 identification: Email correspondence</p> <p>23 from (topmost) S Powell sent</p> <p>24 8/28/2018</p> <p>25 PILF-ADAMS-0041116 - 0041122)</p>

<p style="text-align: right;">Page 178</p> <p>1 Q. The court reporter has marked as Exhibit</p> <p>2 32 a document with the Bates number 41116. Do you</p> <p>3 recognize this document?</p> <p>4 A. This appears to me to be another draft</p> <p>5 from ForthRight Strategies to me in Exhibit 32.</p> <p>6 Q. Okay. So Exhibit 31, we were looking at a</p> <p>7 draft from June of 2018, yes?</p> <p>8 A. Hold on. June 1st, 2018 in Exhibit 31.</p> <p>9 Q. And this draft submitted by Timothy</p> <p>10 Webster of ForthRight Strategies has a submission</p> <p>11 date of August 22nd, 2018, yes?</p> <p>12 A. I thought it was 28.</p> <p>13 Q. Well, the email from Ms. Powell to you is</p> <p>14 August 28th.</p> <p>15 A. Okay.</p> <p>16 Q. But then there's a -- it's called a draft</p> <p>17 copy approval form. Do you see that in the</p> <p>18 attachment?</p> <p>19 A. Page 2.</p> <p>20 Q. Right. And it has a submission date.</p> <p>21 That's what I was referring to.</p> <p>22 A. Well, right, there it says 8-22-18.</p> <p>23 Q. And the package name is, I guess, a field</p> <p>24 on this cover page to the draft letter. It's called</p> <p>25 "Sued Bad News"; is that right?</p>	<p style="text-align: right;">Page 179</p> <p>1 A. It says, "I have some very bad news to</p> <p>2 share with you." That's the first sentence.</p> <p>3 Q. No, but I'm on the cover page.</p> <p>4 A. You mean the first page.</p> <p>5 Q. No, the cover page, the draft -- the</p> <p>6 approval form.</p> <p>7 A. Okay. Got it. Right.</p> <p>8 Q. So you have the email, okay, and then</p> <p>9 before you get to the letter it says "approval page,"</p> <p>10 right? And the package name is Sued Bad News?</p> <p>11 A. That's what it says in the document.</p> <p>12 Q. What is the "package code"?</p> <p>13 A. I have no idea.</p> <p>14 Q. Who sends these letters, if they go out?</p> <p>15 Who actually mails them out?</p> <p>16 A. ForthRight Strategies.</p> <p>17 Q. And then so part of this attachment is</p> <p>18 another draft of a house letter invoking the fact</p> <p>19 that you were, PILF, was sued; is that right?</p> <p>20 A. It's a draft of a letter prepared by</p> <p>21 ForthRight Strategies in Exhibit 32.</p> <p>22 Q. Right, that says, "I have some very bad</p> <p>23 news to share with you. As you know, we're being</p> <p>24 sued for our work investigating and reporting on</p> <p>25 noncitizens illegally registering to vote and</p>
<p style="text-align: right;">Page 180</p> <p>1 actually voting in elections," correct?</p> <p>2 A. That's an accurate statement.</p> <p>3 Q. And that's referring to the LULAC lawsuit,</p> <p>4 correct?</p> <p>5 A. It is. There is no other.</p> <p>6 Q. And a version of this letter was sent out</p> <p>7 to PILF donors, correct?</p> <p>8 A. Well, there we are back again at the same</p> <p>9 issue. If you have a document that shows me that</p> <p>10 this document was sent -- now if you're asking me</p> <p>11 about a version of this letter, what do you mean by</p> <p>12 version, I don't understand. Like a reproduction of</p> <p>13 this letter being a version, or something closely</p> <p>14 approximating this letter being a version? There's</p> <p>15 two different ways to interpret that question. Can</p> <p>16 you clarify it, please?</p> <p>17 Q. Was an edited version of this letter sent</p> <p>18 out to PILF donors?</p> <p>19 A. Okay. That I do not know the answer to.</p> <p>20 If you have an edited version of this letter that you</p> <p>21 could refresh my recollection that indicates it was</p> <p>22 sent, I could answer that question easier -- or at</p> <p>23 all.</p> <p>24 Q. If someone were to donate based on one of</p> <p>25 these house letters, where would that return mail go?</p>	<p style="text-align: right;">Page 181</p> <p>1 A. I don't know.</p> <p>2 Q. Would it go to ForthRight Strategies?</p> <p>3 A. It would go to a P.O. box in Washington,</p> <p>4 D.C.</p> <p>5 Q. And who picks up the mail in that P.O.</p> <p>6 box?</p> <p>7 A. Most likely ForthRight Strategies.</p> <p>8 Q. So they send out the letters and then they</p> <p>9 get the responses; is that right?</p> <p>10 A. ForthRight Strategy sends out the</p> <p>11 letters -- I think it's ForthRight Strategy -- and</p> <p>12 responses go back to a third party, not to PILF. I</p> <p>13 don't see those responses, if that's what you're</p> <p>14 asking.</p> <p>15 I need to take a break. I'm starting to lose</p> <p>16 my voice a little bit. Is this a good time?</p> <p>17 MR. TEPE: It is a good time.</p> <p>18 VIDEO SPECIALIST: We're off the record,</p> <p>19 2:30.</p> <p>20 (Proceedings recessed)</p> <p>21 VIDEO SPECIALIST: We are back on the</p> <p>22 record, 2:46.</p> <p>23 BY MR. TEPE:</p> <p>24 Q. We're ending the questioning of the</p> <p>25 30(b)(6) topic of fundraising and moving on to</p>

<p style="text-align: right;">Page 182</p> <p>1 something else.</p> <p>2 (Johnson Exhibit 8</p> <p>3 previously marked for identification</p> <p>4 and referenced herein: Email</p> <p>5 correspondence from (topmost) N</p> <p>6 Johnson sent 9/29/2016 with</p> <p>7 attachment</p> <p>8 PILF-ADAMS-0005601 - 0005620)</p> <p>9 (PILF Exhibit 9 previously</p> <p>10 marked for identification and</p> <p>11 referenced herein: Email</p> <p>12 correspondence from (topmost) C</p> <p>13 Adams sent 9/29/2016 with attachment</p> <p>14 PILF-ADAMS-0014015 - 0014033)</p> <p>15 Q. Handing to the witness two previously</p> <p>16 marked exhibits, Johnson 8 and PILF 9.</p> <p>17 Mr. Adams, I'm just going to ask you a few</p> <p>18 questions about these two drafts, comparing them.</p> <p>19 To set the foundation here, Johnson Exhibit 8</p> <p>20 is a version of Alien Invasion I that he sent to you</p> <p>21 on September 29th at 4:56 p.m.; is that right?</p> <p>22 A. I'm sorry. There's a siren, and I think</p> <p>23 you said 4 something.</p> <p>24 Q. 4:56 p.m. Let me see if there's a --</p> <p>25 A. It's gone or going.</p>	<p style="text-align: right;">Page 183</p> <p>1 Q. All right. Let me just do that again.</p> <p>2 So Johnson Exhibit 8 is an email attaching a</p> <p>3 draft of the Alien Invasion I report that he sent to</p> <p>4 you at 4:56 p.m. on September 29th, correct? 2016,</p> <p>5 that is.</p> <p>6 A. Right. Johnson 8 says sent 9-29-2016,</p> <p>7 4:56 p.m.</p> <p>8 Q. And PILF Exhibit 9, which you also have in</p> <p>9 front of you, is an email you sent on September 29th,</p> <p>10 2016 at 9:02 p.m. with your edits to the Alien</p> <p>11 Invasion I report; is that right?</p> <p>12 A. Almost correct. It is a document, Exhibit</p> <p>13 9, is an email I sent on 9-29-2016 at 9:02 p.m. with</p> <p>14 some edits to the Alien Invasion report that Noel</p> <p>15 Johnson had sent.</p> <p>16 Q. Okay. Yes. So this may not be all of</p> <p>17 your edits ultimately to the report is what you're</p> <p>18 saying.</p> <p>19 A. Correct.</p> <p>20 Q. But these are your edits -- these are</p> <p>21 edits of yours at this time.</p> <p>22 A. Exactly, yes, that's more accurate.</p> <p>23 Q. I want to direct you to what is page 2 of</p> <p>24 Exhibit 9. It's got the Bates ending in 18. And I</p> <p>25 want you to compare that to Johnson 8 with the Bates</p>
<p style="text-align: right;">Page 184</p> <p>1 number 602. Do you have those two pages in front of</p> <p>2 you?</p> <p>3 A. I have those pages in front of me, right.</p> <p>4 Q. So on PILF 9, on the page with 018,</p> <p>5 there's some text in bold that says, "in our small</p> <p>6 sample of just seven Virginia counties who responded</p> <p>7 to our public inspection requests, we found 976</p> <p>8 aliens who registered to vote illegally." Do you see</p> <p>9 that?</p> <p>10 A. The document says that.</p> <p>11 Q. And that is, if you compare that to</p> <p>12 Johnson 8, that is text that you personally added.</p> <p>13 MR. LOCKERBY: Object to the form.</p> <p>14 A. Well, now -- I don't know. I don't think</p> <p>15 so, but I don't know. I mean, you're essentially</p> <p>16 asking me to do a document compare on the fly, and I</p> <p>17 don't see anything such as a redline that would make</p> <p>18 that an easier question to answer. If you have one,</p> <p>19 that would be extremely helpful to answer your</p> <p>20 question.</p> <p>21 Q. Well, it appears you didn't make these</p> <p>22 edits in Track Changes, which would provide a</p> <p>23 redline.</p> <p>24 A. Right.</p> <p>25 Q. And since we're using the actual documents</p>	<p style="text-align: right;">Page 185</p> <p>1 produced by PILF, absent a redline, I'm asking you to</p> <p>2 do this comparison.</p> <p>3 A. It doesn't make sense that -- this doesn't</p> <p>4 make -- I disagree with the premise that that's a</p> <p>5 change of mine absent something that makes it a</p> <p>6 little more clear.</p> <p>7 I can't imagine -- I mean, there's a chance I</p> <p>8 didn't do it in a redline, but I don't understand how</p> <p>9 that -- you're coming to the conclusion that's my</p> <p>10 change, because Mr. Johnson sent two different</p> <p>11 versions, Exhibit Johnson 8 and PILF 9, and --</p> <p>12 Q. Well, no, Mr. Johnson sent Johnson 8,</p> <p>13 right?</p> <p>14 A. Right, but Johnson 8 doesn't even come</p> <p>15 close to looking like PILF 9.</p> <p>16 Q. Right.</p> <p>17 A. So there's got to be something else here</p> <p>18 you're not showing me.</p> <p>19 Q. You added a lot of text.</p> <p>20 MR. LOCKERBY: Objection, that hasn't been</p> <p>21 established. The only thing that's been established</p> <p>22 is there's a comment on this page from Mr. Adams.</p> <p>23 That's it.</p> <p>24 Q. Okay. Let's take one step at a time.</p> <p>25 A. Right. And I disagree with the idea,</p>



<p style="text-align: right;">Page 186</p> <p>1 absent additional documents, that would utilize tools 2 that would allow me to see the answer to your 3 question. 4 I added a comment to that paragraph. Maybe 5 that's what you're asking me. Maybe I misunderstood 6 your question. Maybe you're asking me if I added 7 that comment. I'm sorry if I -- 8 Q. No, no, I'm not asking, but we'll take it 9 one step and see what we can, you know, agree on. 10 So we have Johnson 8, right. It's a draft 11 that he sent to you on September 29th at 4:56 p.m., 12 right? We already established that, right? 13 A. I won't disagree this was sent to me 14 because that's what the email says. 15 Q. Okay. And then we also have a draft 16 containing at least some of your edits back to 17 Mr. Johnson, same day, four hours later, at 9:02 18 p.m.? 19 A. Well, my edits, I think, are delineated -- 20 my certain edits are delineated which consist of a 21 comment on page 18, and this is -- let me -- let me 22 explain why I can't answer this question easily. 23 Deposition Exhibit 9 PILF is a much more 24 matured document than Johnson 8, and it is not likely 25 that I was responsible for those maturities.</p>	<p style="text-align: right;">Page 187</p> <p>1 Q. Why do you say that? 2 A. Because it involves formatting that I 3 don't have the capability of doing. I don't know how 4 to do a bubble quote like that on page 14018. So 5 that leads me to conclude -- and I don't know how to 6 do a bubble quote on 14021. 7 So, no, I fundamentally disagree. These are 8 not my edits to Johnson 8. In other words, some 9 changes on here are not my edits. That's another way 10 of putting it. 11 Q. Okay. We can agree that the language, "in 12 our small sample of just seven Virginia counties who 13 responded to our public inspection request, we found 14 976 aliens who registered to vote illegally," that 15 language is absent from Johnson 8 and it's contained 16 in PILF 9. 17 A. Okay. You are now asking me to do 18 essentially a mental Ctrl F search for Johnson 8 on 19 the fly, and I don't know the answer to that, as I 20 sit here. I can go through and do that page by page, 21 and I'm happy to do that if you direct me to do that, 22 to the best of my ability. 23 Q. You do recall that this sentence, "in our 24 small sample," appeared ultimately in Alien Invasion 25 I with the exception it became eight Virginia</p>
<p style="text-align: right;">Page 188</p> <p>1 counties and 1,046 aliens. 2 A. Okay. So you're asking me if a different 3 version of this sentence appeared in the final 4 report. 5 Q. Right. 6 A. I recognize words like "small sample," 7 "just," "responded to our public inspection 8 requests." I have some recollection -- and I see 9 that I probably have not been handed that exhibit in 10 this deposition -- I have some recollection that 11 something similar to this appeared somewhere. I've 12 seen this language before, not in PILF 9. 13 Q. On page 7 of PILF 9, which is -- there's 14 no page numbers -- it's got the Bates number 023 -- 15 the language, second paragraph from the bottom, "the 16 United States attorney in Virginia has done nothing 17 about the felonies committed by 433 aliens 18 registering in Prince William County alone." Do you 19 see that language? 20 A. I can read that language. 21 Q. That language, if you go to Johnson 8 with 22 the Bates number 5608 -- and actually 5609 -- that 23 language in PILF 9 does not appear in Johnson 8; 24 would you agree with that? 25 A. Well, there's a lot of differences.</p>	<p style="text-align: right;">Page 189</p> <p>1 Q. I understand, but I'm just focused on this 2 one sentence that I read out of PILF 9. That 3 sentence doesn't appear in PILF -- excuse me -- 4 Johnson 8. 5 MR. LOCKERBY: Object to the form, assumes 6 facts not in evidence and in fact contrary to the 7 evidence. 8 A. I mean, there's multiple people doing 9 edits of this at one time. Somebody edited this 10 document that wasn't me to add a variety of things 11 that I don't have the technical capability, which is 12 very minimal, but I still don't possess it, to do 13 certain things in this document, leading me to 14 conclude that it wasn't my edit, but, the more 15 important thing is that the United States attorney 16 language would fall between Bedford County -- but 17 then there's a different paragraph above that also. 18 Q. Right. I think, having looked at this, I 19 can possibly help you. So there is a one-sentence 20 paragraph in Johnson 8 that says, "there is no other 21 indication that Prince William County (or the state 22 board -- state election board) forwarded information 23 to local or federal prosecutors on these 433 24 potential felons for investigation and prosecution." 25 Do you see that?</p>

<p style="text-align: right;">Page 190</p> <p>1 A. No. Where? What page?</p> <p>2 Q. I just read it from Johnson 8. You have</p> <p>3 your finger on it.</p> <p>4 A. Right, but -- oh, I see. Okay.</p> <p>5 Q. Right. So that language in Johnson 8 was</p> <p>6 replaced with, in PILF 9, "United States attorney in</p> <p>7 Virginia has done nothing about the felonies</p> <p>8 committed by 433 aliens registering in Prince William</p> <p>9 County alone." Would you agree with that?</p> <p>10 A. I agree that there's different versions of</p> <p>11 a similar topic in Johnson 8 and PILF 9.</p> <p>12 Q. Okay. And sitting here today, you don't</p> <p>13 know whether you or someone else added the language</p> <p>14 beginning "the United States attorney in Virginia."</p> <p>15 A. You know I've -- you've asked that and</p> <p>16 I've answered it.</p> <p>17 Q. Well, I asked that about a different</p> <p>18 passage, and so now I'm asking about this passage.</p> <p>19 A. Right. I don't recall who made that edit,</p> <p>20 and I indicated to you, if you had a redline, it</p> <p>21 would be an easier way to answer your questions.</p> <p>22 Right now I don't have a clear recollection.</p> <p>23 Q. You can put those documents aside.</p> <p>24 Do you have a relationship with Donald Palmer?</p> <p>25 A. If I were to look up the word</p>	<p style="text-align: right;">Page 191</p> <p>1 "relationship" in the dictionary, I would suspect</p> <p>2 there's at least six definitions, probably more.</p> <p>3 Perhaps your question could be focused on one of</p> <p>4 those so I can better understand the question.</p> <p>5 Q. Do you know Donald Palmer?</p> <p>6 A. I do know Donald Palmer.</p> <p>7 Q. How do you know him?</p> <p>8 A. I'm sorry?</p> <p>9 Q. How do you know him?</p> <p>10 A. Are you asking me when I first met him or</p> <p>11 are you asking me --</p> <p>12 Q. We can go there. When did you first meet</p> <p>13 him?</p> <p>14 A. I met him in the fall of 2005.</p> <p>15 Q. And what was the occasion of meeting him</p> <p>16 in the fall of 2005?</p> <p>17 A. Both of us were employed by the</p> <p>18 United States Department of Justice in the voting</p> <p>19 section.</p> <p>20 Q. And how long did you have as an</p> <p>21 overlapping time period; do you recall?</p> <p>22 A. That I don't know the answer to.</p> <p>23 Q. What was his position at that time?</p> <p>24 A. He was an attorney in the voting section.</p> <p>25 Q. And you were an attorney in the voting</p>
<p style="text-align: right;">Page 192</p> <p>1 section.</p> <p>2 A. Correct.</p> <p>3 Q. Since fall of 2005 have you had occasions</p> <p>4 to work with Mr. Palmer?</p> <p>5 A. Absolutely.</p> <p>6 Q. How many times?</p> <p>7 A. There's no way to categorize that.</p> <p>8 There's utterly no way to do that.</p> <p>9 Q. Why is that?</p> <p>10 A. Because your question is vague, for one.</p> <p>11 Q. You can't quantify how many times you've</p> <p>12 worked with him?</p> <p>13 A. That wasn't your question. You said how</p> <p>14 many times have you had an opportunity to work with</p> <p>15 him.</p> <p>16 Q. No, my question was, since fall of 2005,</p> <p>17 have you had occasions to work with Mr. Palmer. You</p> <p>18 said absolutely. I asked how many times.</p> <p>19 A. Right. I have never been employed at the</p> <p>20 same location as Mr. Palmer since approximately --</p> <p>21 approximately, with plus or minus two years -- 2007.</p> <p>22 Q. Have you had occasion to work with him on</p> <p>23 various projects?</p> <p>24 A. He was retained to write a best practices</p> <p>25 document for PILF was one example.</p>	<p style="text-align: right;">Page 193</p> <p>1 Q. Has he served as an expert witness in any</p> <p>2 of your cases?</p> <p>3 A. Well, okay, you are -- let me put it this</p> <p>4 way. I don't know what the stage of designation was,</p> <p>5 and depending on what the stage of the designation</p> <p>6 was, it could intrude on the attorney-client</p> <p>7 privilege for a client. So I'm attempting to</p> <p>8 carefully answer the question, and maybe you could</p> <p>9 give me something that would help me avoid any</p> <p>10 privilege issues.</p> <p>11 Q. Well, I'm certainly not trying to get into</p> <p>12 any privilege issues. I mean, the question is just</p> <p>13 simply, has he served as an expert witness in any of</p> <p>14 your cases?</p> <p>15 MR. LOCKERBY: I'm going to object, and,</p> <p>16 in view of the witness's concerns about</p> <p>17 attorney-client privilege and work product, instruct</p> <p>18 the witness that perhaps one way of answering the</p> <p>19 question without disclosing privilege or work product</p> <p>20 would be to limit the answer to disclosed testifying</p> <p>21 experts.</p> <p>22 A. Again, it would be helpful if you have a</p> <p>23 document that would refresh my recollection to answer</p> <p>24 your question. Such a document might include a</p> <p>25 notice with the court, it might include a filing with</p>

<p style="text-align: right;">Page 194</p> <p>1 the court, or a variety of other public documents 2 that would help me answer that question better and 3 more accurately without violating privileges. 4 Q. Well, I'll happily adopt Mr. Lockerby's 5 suggestion and ask the question, has Mr. Palmer 6 served as a disclosed expert on any of your cases? 7 A. He might have. 8 Q. In what case might he have served as a 9 disclosed testifying expert? 10 A. There is a chance that he may have been a 11 disclosed testifying expert in ACRU vs. Starr County. 12 Q. Other than potentially that engagement and 13 the retention to draft a best practices guide, have 14 you had occasion to work with Mr. Palmer on other 15 projects? 16 A. Absolutely. 17 Q. Such as? 18 A. There is no way to catalog a decade's 19 worth of communication. So one of the areas that 20 Mr. Palmer and I have had communications relates to 21 the role of noncitizens getting on the voter rolls 22 and voting. 23 Q. And what communications specifically are 24 you referring to? 25 A. Well, it's not a specific communication;</p>	<p style="text-align: right;">Page 195</p> <p>1 it's a broad range of communications relating to his 2 awareness that noncitizens were getting on the voter 3 rolls and voting based on his experience as an 4 elected -- excuse me -- a chief state elections 5 officer in two of the largest states in the 6 United States. 7 Q. You're talking about Virginia and Florida? 8 A. Correct. 9 Q. So you work with him regularly on election 10 matters; is that what you're saying? 11 A. No, I disagree with that characterization 12 actually. 13 Q. Well, you said there's no way to catalog a 14 decade's worth -- 15 A. Keep going. 16 Q. -- of communication. 17 A. There you go. 18 Q. Why isn't there a way to catalog a 19 decade's worth of communication? 20 A. Because it is so pervasive and extensive 21 and regular that -- and elastic and otherwise 22 ongoing -- that it can't be cataloged. And I've 23 given you a very specific example. 24 Q. There's no question pending. 25 Did he have a role of any kind with respect to</p>
<p style="text-align: right;">Page 196</p> <p>1 the Alien Invasion reports? 2 A. Yes. 3 MR. LOCKERBY: Object to the form. 4 A. Depending on what that role, you mean by 5 that. 6 Q. Did he have any hand in drafting the 7 reports? 8 A. A hand in ... I don't understand what you 9 mean by "a hand in." 10 Q. Did he draft any words that appear in the 11 Alien Invasion reports? 12 A. He may have, but he may not have. 13 Q. You did send him a copy of at least one of 14 the Alien Invasion reports before it was published, 15 right? 16 A. I did. 17 Q. In fact, I think PILF 9, which we were 18 just looking at, refers to sending a draft to Don, 19 right? 20 A. PILF 9 says, "I am going to send to Don." 21 Q. That's Don Reag -- uh, Don Palmer? 22 A. Correct. 23 (Adams Exhibit 33 marked for 24 identification: Email correspondence 25 from (topmost) C Adams sent</p>	<p style="text-align: right;">Page 197</p> <p>1 9/30/2016 2 Non-Party Palmer000035) 3 Q. The court reporter has marked as Exhibit 4 33 an email with the Bates number Non-Party 5 Palmer000035. Do you see this document? 6 A. I see this document. 7 Q. Do you recall this email exchange with 8 Mr. Palmer? 9 A. Yes. 10 Q. And so on September 30th at 1:04 a.m. you 11 sent an email to Mr. Palmer copying Mr. Johnson, with 12 the subject line, "For Your Eyes Only, Virginia Alien 13 Invasion." Do you see that? 14 A. That's what the document says. 15 Q. It says, "Don, do you have time to take a 16 look at this ASAP with any edits or changes to 17 suggest? This is our first rough and fast draft of 18 the Alien Invasion for Virginia." Do you see that? 19 A. Well -- 20 Q. That's what you wrote. 21 A. -- what you said was not what I wrote, but 22 I'm just making sure the word is clear. You did not 23 indulge my typo. You said take a look at when you 24 read it, but it says "take a look a this ASAP." You 25 didn't read my mistake.</p>

1 Q. I apologize. I will try to do better next  
2 time.

3 A. Just want to make the record clear.

4 Q. That's fine. And then you wrote, "feel  
5 free to hammer Cortes with some changes where you see  
6 fit," right?

7 A. It says that.

8 Q. And so with this email you were attaching  
9 a draft -- we don't have it in front of us obviously  
10 because this is the first in a chain -- but you were  
11 attaching a draft for Mr. Palmer to look at; is that  
12 right?

13 A. Yeah. What's strange is the email  
14 doesn't -- is there a second page of this? The email  
15 doesn't show an attachment. It references one. I  
16 have no reason to doubt that -- and I have a specific  
17 recollection of sending him one.

18 Q. Right. I mean, this is the first email in  
19 the chain. Usually the attachment gets dropped off,  
20 right?

21 A. Okay. Right, but it should say something  
22 about it, but, nonetheless, I just want the record to  
23 be clear again that it doesn't reference the  
24 attachment.

25 Q. Well, Mr. Palmer responds to you on

1 September 30th. He says:

2 "I found a little pearl for you.

3 Here is our very own Kathy Culliton,  
4 Advancement Project, testifying  
5 against the use of the SAVE database  
6 in Virginia. Guess who else worked  
7 at the Advancement Project? Edgardo  
8 Cortes. Of course, this is the pool  
9 of talent of the current governor."

10 Do you see that?

11 A. (Nodding head up and down.) Yes.

12 Q. And you wrote back, "perfect find," and  
13 you continued, "Noel," who is also copied on this  
14 email, "Culliton needs to be kicked somehow. Don and  
15 I both know her well." And then you provide some, I  
16 guess, proposed language.

17 A. More a narrative is what I call it.

18 Q. Okay. This information from Mr. Palmer,  
19 did you feed that to Breitbart?

20 MR. LOCKERBY: Object to the form.

21 Q. Did you share that information with  
22 Breitbart?

23 A. I don't think I did, but there's a chance  
24 I did. Obviously lots of people knew it.

25 Q. At this time you didn't know it.

1 A. You mean right now?

2 Q. No, at this time, September 30th.

3 A. Don informed me of this because --

4 Q. But my question -- I'm sorry. My question  
5 is, at this time, when Don informed you, you did not  
6 already have this information; is that right?

7 A. Well, "this information," what part do you  
8 mean? I mean, he gives me a number of pieces of  
9 information here. One -- I can break it up -- one,  
10 two, three, four -- four different pieces of  
11 information.

12 When you say "this information," there's four  
13 different ones here, some of which I knew, some of  
14 which I didn't.

15 Q. Did you know that Edgardo Cortes,  
16 according to this, worked at the Advancement Project  
17 at this time?

18 A. Well, this gets exactly into Don Palmer,  
19 why he wanted to be involved in this project, and I  
20 reference that very clearly in the email, at least to  
21 me, where I indicate something along the lines of, I  
22 know he is not acting like you would. That sentence  
23 has a whole bundle of other facts behind it related  
24 to my conversations with Don that led to Alien  
25 Invasion.

1 And so I would have known, quite possibly,  
2 that -- that Cortes was now with the Advancement  
3 Project by then. Would I have known about Kathy  
4 Culliton being there? Probably not, because I  
5 thought she was with another organization.

6 Q. Well, just to be clear in your answer,  
7 according to this email, Mr. Cortes worked at the  
8 Advancement Project before he was picked by Governor  
9 McAuliffe, right?

10 A. Well, right, and you asked me -- and I  
11 think he's there now. So when you asked me, did you  
12 know this already, that's one of the reasons my  
13 answer would have been for some of the information  
14 yes. You were asking me what I did or did not know  
15 on a certain day, and I said there's multiple packets  
16 of information.

17 Q. Right.

18 A. And the answer would be different for each  
19 one.

20 Q. Right. And for the package with regard to  
21 Cortes and Advancement Project, did you know that, do  
22 you recall, at that time?

23 A. I don't remember. I mean, I think I  
24 probably would have if he -- if Edgardo had been at  
25 the Advancement Project prior to working for the

governor, I probably would have known that.

Q. You can put that document aside.

Do you know Cameron Quinn?

A. Yes.

Q. How do you know her?

A. Well, Cameron and I both worked at the Department of Justice together.

Q. Voting rights section?

A. No.

Q. Where were you?

A. I was in the voting rights section.

Q. And where was she?

A. She was a counsel to the assistant attorney general.

Q. For civil rights?

A. Yes.

Q. For how long did your tenures overlap at DOJ?

A. That I don't know. Maybe -- I'd be speculating.

Q. Have you worked with Ms. Quinn on any projects since your tenure at DOJ?

A. Yes.

Q. What projects?

A. Well, one of them was attempting to

catalog the problem, the pervasive and empirical problem of noncitizen registration voting in Fairfax, for which Cameron and Hans von Spakovsky had amassed a rather voluminous documentary record.

And what it showed was noncitizens registering, noncitizens voting in Fairfax, and in fact was one of the genesis of this report, was the awareness of a problem in Fairfax of Cameron Quinn, when she was the general registrar of Fairfax, and when Hans von Spakovsky, when they were on the board of Fairfax, attempted to remedy.

And, indeed, this prior history of noncitizens registering in Fairfax that Cameron Quinn brought to my attention was one of the reasons this report was done, was an effort to fix this problem that was without any dispute occurring in at least one very large, if not the largest county, in the Commonwealth of Virginia.

Q. So when I asked what projects you had worked with Ms. Quinn on, you said one of them was attempting to catalog the problem of noncitizen registration and voting in Fairfax, right, and then you elaborated on that, correct?

A. My testimony speaks for itself.

Q. Other than that cataloging, are there

other projects that you have worked with Ms. Quinn on?

A. Certainly.

Q. Such as?

A. Well, Alien Invasions is an offshoot of a project working with Cameron Quinn, that the data that they collected in Fairfax was part of the projects I worked with.

Remember, there was -- the Fairfax data collection that she engaged in and then we got copies of was the first attempt at cataloging noncitizen registration and voting in the Commonwealth. Alien Invasion itself was, if you will, the next phase of that project.

Now where the lines of demarcation are between Cameron collecting the data as the GR versus us beginning to organize it, I couldn't tell you, but those are two different things we worked on together.

Q. I'm not sure if I follow. So I'm only seeing one project, and that is her providing information to you about things that happened in Fairfax County. That's one thing, right?

A. No, you've minimized the role -- when you said "providing information," that's certainly not the extent of what she did.

Q. No, no, I'm not trying to minimize. I'm just trying -- I'm just trying to understand, other than this Fairfax situation, are there other projects, that was my question, besides Fairfax and the issues in Fairfax, are there other things that you worked on with Ms. Quinn?

A. I think the reports would be a second. Was she working directly every single day, certainly not, but the efforts to catalog noncitizen voting in the Commonwealth as manifested by Alien I and Alien II would not have occurred without her assistance.

Q. Did she edit any drafts of the Alien Invasion reports?

A. Unlikely. I don't want to preclude it. Right, no, this was in '17. So it's extremely unlikely that Alien II drafts would have been seen by Cameron. And whether or not Alien I was, I can't say for certain, but it would have also been probably unlikely.

Q. Did she collect any records that were then used for either the Alien Invasion reports?

A. Yes.

Q. What records did she collect?

A. Well, when she was the general registrar in Fairfax County, she was collecting the records

1 that we first examined to use for our research. So  
2 she was in an official capacity, but she was still  
3 the one collecting these records.

4 Q. Okay. I think just to make sure my  
5 question is clear, none of those records themselves  
6 made it into the Alien Invasion reports.

7 A. I actually think they did. I think they  
8 did.

9 Q. What records?

10 A. I think you're mistaken. The records of  
11 noncitizen cancellation in Fairfax, the documents  
12 associated, the large numbers, frankly, of voter  
13 registration forms where the person marks no, they  
14 are not a citizen, those are records she collected  
15 that I reviewed that probably were included in  
16 Alien I.

17 Now did she collect them like some of the  
18 people that your law firm organized? No, she didn't  
19 go out and run around the state and collect records  
20 from registrars. She did it in an official capacity  
21 related to the collection of various noncitizen  
22 records, which were stored in an official capacity,  
23 which she alerted to me -- me.

24 That's the other part of her role is that she  
25 made it known to me that these records existed. And

1 that's the first step in a third party collecting  
2 records is to be aware of its existence.

3 Q. Have you discussed the LULAC lawsuit with  
4 Ms. Quinn?

5 A. There's some chance I have, but I don't  
6 have a specific recollection of it.

7 Q. Have you corresponded with her with regard  
8 to the LULAC lawsuit?

9 A. Highly unlikely, but if you have a  
10 document to refresh my recollection, I'm happy to  
11 look at it.

12 Q. When was the last time you spoke with  
13 Ms. Quinn?

14 A. Hmm ... it's probably within the last  
15 month, but it might be five weeks. It could be  
16 within the last two months. I do not have a specific  
17 recollection of that conversation other than the fact  
18 that it occurred relatively recently.

19 Q. And do you recall if this conversation  
20 concerned the present lawsuit?

21 A. I just answered your question. I didn't  
22 have a specific recollection.

23 Q. Have you corresponded with Ms. Quinn about  
24 this lawsuit by email correspondence?

25 A. Oh, certainly not, not that I can

1 remember. Again, as I said, if you have a document  
2 that says otherwise, I'm happy to revise my answer.

3 Q. But you don't, sitting here today, you  
4 don't have any recollection.

5 A. No. I mean, there is some chance that at  
6 some point in the last year that some reference was  
7 made in some communication with Cameron Quinn  
8 involving this lawsuit.

9 But, as we know, I would be surprised that  
10 that correspondence has not already been turned over,  
11 if it existed, given the protocols which are in place  
12 to search for documents.

13 Let me put it this way. In the 52,000 pages  
14 that I reviewed to respond to your written discovery  
15 requests, I don't remember seeing any communications  
16 with Cameron Quinn, as I sit here right now.

17 (Adams Exhibit 34 marked for  
18 identification:Email correspondence  
19 from (topmost) C Adams sent  
20 2/20/2019 PILF-ADAMS-0046678)

21 Q. The court reporter has marked as Exhibit  
22 34 a document with the Bates number 46678. Do you  
23 recognize this document?

24 A. I see document 34.

25 Q. And it's an email from you to Cameron

1 Quinn dated February 20th, 2019; is that right?

2 A. It is.

3 Q. And the subject line is "FYI -- involves  
4 friends."

5 A. That's what the subject line says.

6 Q. Do you know what that was in reference to?

7 A. I don't remember this document.

8 Q. In this document there's a link to a  
9 website [www.scribd.com](http://www.scribd.com)?

10 A. I see the link.

11 Q. And in the URL for the link it says,  
12 "Adams-Declaration."

13 A. Well, the URL says that.

14 Q. Right. Did you send a copy of the  
15 declaration that you drafted and submitted in  
16 response to Defendant's -- excuse me -- Plaintiff's  
17 motion to compel the production of documents to  
18 Ms. Quinn?

19 A. Wait. There's a -- there is a motion to  
20 compel production of documents of Ms. Quinn in this  
21 case? I don't understand the question. Repeat it,  
22 if you might.

23 Q. There was a motion filed by Plaintiffs in  
24 this case to compel you to produce more documents,  
25 correct?

1 A. Right, but I thought you said something  
2 about --

3 Q. And then -- I'm just clarifying -- and did  
4 you send -- and in response to that motion you  
5 drafted a declaration, correct?

6 A. Right.

7 Q. And did you send that declaration to  
8 Ms. Quinn through this link?

9 A. Yeah, I don't know. I don't know. I  
10 don't know what this link is. It could have been,  
11 could have not been. I mean, hit the link, and then  
12 it's easier to answer your question.

13 Q. You don't recall whether or not you sent  
14 Ms. Quinn a copy of your declaration filed in  
15 response to Plaintiff's motion to compel?

16 A. If I didn't remember Exhibit 34 even being  
17 sent, I'm not going to remember what this link is.

18 Q. So the answer is you don't recall.

19 A. No, I don't.

20 (Adams Exhibit 35 marked for  
21 identification: Email correspondence  
22 from (topmost) N Johnson sent  
23 5/16/2016 with attachment  
24 PILF-ADAMS-0007236 - 0007238)

25 Q. The court reporter has marked as Exhibit

1 35 a document with the Bates number 7236. Do you  
2 recognize this document?

3 A. I see Exhibit 35.

4 Q. And in Exhibit 35 it shows an email from  
5 Cameron Quinn to you dated May 12th, 2016, correct?

6 A. That's what the document says.

7 Q. And the subject line is "to perhaps  
8 consider," correct?

9 A. I can read that it says that.

10 Q. Do you recall receiving this email from  
11 Ms. Quinn?

12 A. This document, 35, refreshes my  
13 recollection to some degree, but I don't have a lot  
14 of memory, because I haven't seen this for -- we're  
15 going on three years now.

16 Q. The email of Ms. Quinn was turned into a  
17 draft FOIA request by Noel Johnson; is that correct?

18 A. Well, I don't necessarily think it is, but  
19 I'm not sure. Draft attached ... it can be emailed  
20 to the address provided in the letter, FOIA, right.

21 I mean, I don't know the answer to your  
22 question. I know that it is a document that Noel  
23 Johnson appears to have worked up into an advanced  
24 stage. Whether or not it was sent, I don't know the  
25 answer to that.

1 Q. And this is -- whether or not it was sent,  
2 this draft purports to come from you, correct?

3 A. Well --

4 Q. It's your signature on the --

5 A. Right, it would have to because Virginia  
6 has a law that doesn't let anybody else get it.

7 Q. Well, the law being that, to issue a  
8 Virginia FOIA request, you have to be a resident of  
9 Virginia.

10 A. Correct.

11 Q. Now the FOIA request -- well, let's start,  
12 go back to the email of Ms. Quinn.

13 In her email with the subject line "To Perhaps  
14 Consider," she states, "all travel records for  
15 Edgardo Cortes and Elizabeth Howard 2014 to current."  
16 Do you see that?

17 A. I can read that on the document.

18 Q. And it says, "all phone records," with  
19 some quotation marks after it, which, presumably, is  
20 saying all phone records for Edgardo Cortes and  
21 Elizabeth Howard.

22 A. I can read that in the document.

23 Q. Do you agree with that?

24 A. I agree that it's in the document. Do I  
25 agree with what the figures mean afterwards? It's

1 peculiar. I hadn't thought about it.

2 Q. Sometimes people use quotation marks as  
3 kinds of to mean the same as those previously --

4 A. Oh, you're suggesting these are ditto  
5 marks.

6 Q. Yes.

7 A. I wouldn't disagree with that.

8 Q. Okay. "All leave records for Edgardo  
9 Cortes and Elizabeth Howard"?

10 A. I can read it says that.

11 Q. All calendars for the two of them, right?  
12 "All calendar for Cortes and Howard," yes, that was  
13 one of the things listed here by Ms. Quinn?

14 A. I can read that it says that.

15 Q. And those same, I guess, requests are  
16 contained in the draft FOIA request that's attached,  
17 yes?

18 A. I don't know. I haven't compared. Let me  
19 do that.

20 Okay. Appears to contain that request.

21 Q. Who is -- so Ms. Howard was the deputy  
22 commissioner of the Department of Elections, yes?

23 A. Who?

24 Q. Ms. Howard.

25 A. I don't know. Hold on. Where do you see

1 the name Howard?

2 Q. Elizabeth Howard, it's on Cameron Quinn's  
3 email, and then it's also in the draft FOIA request.

4 A. Oh, okay, right. I don't know who she is.

5 Q. But according to the draft FOIA request,  
6 she's the deputy commissioner.

7 A. Okay. There you are. Exhibit 35,  
8 attachment characterizes her as the deputy  
9 commissioner.

10 Q. What was the purpose of drafting this FOIA  
11 request?

12 A. Well, just like in other circumstances  
13 related to the drafting of the Alien Invasion report,  
14 former election officials have a pretty good idea of  
15 when something is going wrong inside an election  
16 department, and this is one of multiple pieces of  
17 information that came to my attention about  
18 malfeasance within Commissioner Cortes's tenure  
19 related to problems associated with how elections are  
20 run in that office. And the purpose of this was to  
21 find government records related to potential  
22 malfeasance in an election office and eventually  
23 analyze them and take appropriate action once  
24 received.

25 Q. What would travel records for Mr. Cortes

1 have to do with malfeasance in the Department of  
2 Elections?

3 A. Well, that's a pretty easy one. If people  
4 were inappropriately turning in travel records, as  
5 has been my experience and Ms. Quinn is probably  
6 aware of the situation, where Department of Justice  
7 employees were charging up to \$30,000 in fake travel  
8 records and turning it in to the government for  
9 reimbursement.

10 So this is not something that's a rare event.  
11 This is something that happens in government. And I  
12 have some recollection of Ms. Quinn indicating that  
13 there's a problem related to travel records  
14 associated with employees of the Department of  
15 Corrections. And if they are wasting money on travel  
16 instead of paying for other utilities to help  
17 maintain the voter rolls or doing data searches for  
18 all the dead people on the rolls, then that's a  
19 highly relevant question.

20 Q. You said the Department of Corrections.

21 A. I'm sorry. Department of Elections.  
22 Everything else I stand by.

23 Q. Were you fishing for dirt on Mr. Cortes?

24 MR. LOCKERBY: Object to the form.

25 A. "Fishing for dirt" ... I would dispute

1 your characterization, considering I just gave you a  
2 fairly lengthy answer, but I'll give you another one  
3 that might be longer.

4 Mr. Cortes --

5 Q. It's a yes or no question.

6 A. I don't agree with the premise. I don't  
7 understand the question. But if you're asking me  
8 whether I wanted to get to the bottom of whether  
9 there was travel fraud or leave fraud or people not  
10 turning in leave when they should have, as may indeed  
11 have been the case, or, if we can keep going, résumés  
12 of the people who were hired because there were  
13 indications that very partisan people were being  
14 hired into a nonpartisan office, or if we wanted to  
15 examine the people currently employed because we  
16 understood that there was a lot of waste and abuse in  
17 the employment process, then, yes, I would have been  
18 seeking to get those through public information  
19 requests, which we're allowed to have, and whatever  
20 that information would have revealed may or may not  
21 have been, as you categorize it, as dirt, but it  
22 could have been exculpatory, it could have been not  
23 exculpatory.

24 Q. Do you know Ken Blackwell?

25 A. I do.

1 Q. How do you know him?

2 A. I'm sorry?

3 Q. How do you know him? I'm sorry.

4 A. Well, are you asking me when I first  
5 became aware of him?

6 Q. When did you first meet Mr. Blackwell?

7 A. Well, I may have had my first  
8 communication with Mr. Blackwell sometime in the fall  
9 of '05 when I was an attorney with the United States  
10 Department of Justice.

11 Q. Why do you say you may have had your first  
12 communication with him at that time?

13 A. That's my recollection.

14 Q. Do you recall what that communication was  
15 about?

16 A. Yes.

17 Q. What was it about?

18 A. I'm not going to answer you because it's  
19 the privilege of the United States.

20 Q. Did that privilege extend to  
21 Mr. Blackwell? I mean, he's not -- he's a third  
22 party, yes?

23 MR. LOCKERBY: Well, objection, the  
24 witness has identified with whom or by whom he was  
25 employed at the time and also that the privilege



1 belonged and still belongs to his former employer.

2 Q. What's the nature of the privilege?

3 A. Attorney-client, work product, and many  
4 other things that federal programs will -- probably  
5 can come up with that will bog you down for months,  
6 if you press.

7 Q. So the first communication that you had  
8 with Mr. Blackwell concerns something that you  
9 believe is protected by a attorney-client or attorney  
10 work-product privilege of the United States.

11 A. I do.

12 Q. And what was the topic of that  
13 conversation, without getting into the contents of  
14 the conversation?

15 A. I will provide you absolutely no testimony  
16 regarding that entire matter because federal programs  
17 would never agree to my ability to waive anything  
18 related to that function.

19 Q. Other than this initial communication,  
20 have you had other communications with Mr. Blackwell  
21 since then?

22 A. I have. Well -- go ahead.

23 Q. I was going to ask, how many  
24 communications have you had with him?  
25 A. It is impossible to quantify that.

1 Q. You've had many conversations with him;  
2 that's why it's impossible to quantify?

3 A. Yeah, I mean, that's part of why it's  
4 impossible.

5 Q. Why else is it impossible to quantify  
6 besides the frequency?

7 A. Because I don't keep records of it.

8 Q. Have you worked with him on any projects  
9 over the years?

10 A. Yes.

11 Q. What projects?

12 A. Well, one of them would be our time  
13 working together on the Presidential Advisory  
14 Commission for Election Integrity. I consider that  
15 to be a project, if you will, or at least -- I  
16 suspect you would consider that to be a project.

17 Q. Broadly defined, I would.

18 A. Right.

19 Q. What other projects?

20 A. Well, I don't know how you define  
21 "projects" at that point. That's clearly one that  
22 would fall within a reasonable definition of a  
23 project.

24 Q. Okay. What's your definition of a  
25 project? It apparently includes serving on the

1 Presidential Advisory Commission.

2 A. Indeed.

3 Q. What's your definition of a project?

4 A. Well, a focused effort to produce a  
5 particular product.

6 Q. Okay. Using that definition, have you had  
7 occasion to work with Mr. Blackwell on other  
8 projects?

9 A. I believe we have some occasion to work on  
10 free speech issues together.

11 Q. Such as?

12 A. Well, there's no defined project.

13 Q. Okay. Well, that's what I'm trying to  
14 find out. Are there defined projects, as you defined  
15 it, that you worked with him on?

16 A. Well, I wouldn't say defined projects. We  
17 have issues that overlap that we care about, free  
18 speech and the First Amendment being one of them.

19 Q. Have you worked with him on draft white  
20 papers?

21 A. Mr. Blackwell and I were on the  
22 Presidential Advisory Commission, and we have worked  
23 on documents related to that time.

24 Q. Other than that, have you worked with him  
25 on some collaborative work product, like an article?

1 A. Almost certainly, but I don't have a  
2 specific recollection.

3 Q. Are there other -- other than -- were you  
4 saying yes to an article, or indicating that there  
5 was probably an article, or are you thinking of  
6 something other than an article that's in a written  
7 --

8 A. Mr. Blackwell and I have worked on a  
9 variety of issues. Whether or not they manifest  
10 themselves to something in writing, I can't catalog  
11 for you, but there are a number of them that we share  
12 similar beliefs that we would have worked together  
13 on.

14 Q. What are some of those similar beliefs?

15 A. Free speech, that the First Amendment is  
16 under attack by organizations like LULAC, and that  
17 there's an effort to chill debate and discussion  
18 about important public policy issues related to  
19 elections and other matters, and that money pours  
20 into the effort to chill and intimidate speakers, and  
21 the ramifications include people trying to be killed  
22 where Mr. Blackwell works.

23 And so Mr. Blackwell has some firsthand  
24 experience with people with firearms coming to his  
25 office and trying to murder people. And so those are

1 some of the issues we talk about.

2 Q. Other than the First Amendment, are there  
3 other issues that you have common positions on?

4 A. Right, we do. Election integrity is  
5 another one that Mr. Blackwell more than likely  
6 shares my belief that having a system in place that  
7 prevents noncitizens from getting on the rolls and  
8 not disenfranchising citizens is a very important  
9 public policy that right now is not being met by  
10 election officials around the country, and, frankly,  
11 not being met by federal law.

12 Q. In terms of just concrete things in terms  
13 of your work with Mr. Blackwell, so far you've  
14 identified this privileged communication stemming  
15 from your time at DOJ, correct, that's one?

16 A. I identified a privileged communication  
17 that I'm not going to answer questions about.

18 Q. And then this white paper with respect to  
19 the Presidential Advisory Commission, that's a  
20 second, I guess, concrete thing you've worked with  
21 him on, right?

22 A. I've worked with Mr. Blackwell on the  
23 Presidential Advisory Commission on a wide variety of  
24 things.

25 Q. Are there other -- I'm just looking for

1 concrete projects that the two of you have worked on  
2 that you can recall sitting here today.

3 A. Mr. Blackwell and I have never worked on  
4 concrete. But other than that, we've worked on  
5 projects together. How you define concrete is the  
6 question. And so far concrete is an inadequate  
7 description for me to answer without knowing what  
8 you're asking.

9 We have probably signed letters together.  
10 That's another example. If you've got a document  
11 that you want me to talk about and can refresh my  
12 recollection about the concrete event, I'm happy to  
13 do that.

14 (Adams Exhibit 36 marked for  
15 identification: Email correspondence  
16 from (topmost) N Johnson sent  
17 1/4/2018  
18 PILF-ADAMS-0004281 - 0004282)

19 Q. The court reporter has marked as Exhibit  
20 36 a document with the Bates number beginning 4281.  
21 There's really only one thing I want to ask you  
22 about, and it's focused on the first email in the  
23 chain.

24 A. Okay. "I'll get the request out today"?

25 Q. No, the first email in the chain meaning

1 the earliest, which is at the end, right? So there  
2 appears to be an email that you sent on January 4th,  
3 2018; is that right?

4 A. An email from me.

5 Q. 8:20 a.m.?

6 A. I can see it says that.

7 Q. I'm sorry?

8 A. It says that.

9 Q. Yes. Do you recall sending this email at  
10 8:20 a.m. on January 4th of 2018?

11 A. Of course not, but I see it says that.

12 Q. And then you wrote, "okay, Logan, here's  
13 the plan we came up with Hans and Ken Blackwell. We  
14 are going to do our own report (some of us)." Do you  
15 see that?

16 A. It says that.

17 Q. Right. And is this referring to a report  
18 that you guys -- "you guys" being Hans, Ken  
19 Blackwell, yourself -- would draft with regard to the  
20 Presidential Advisory Commission?

21 A. No. It says the framework is we're going  
22 to plug in factual specifics Virginia, New Jersey,  
23 Pennsylvania, ACRU finding -- I mean, it's telling  
24 you what this is right here in the email.

25 Q. Right. And this email was sent after the

1 Presidential Advisory Commission was disbanded,  
2 correct?

3 A. Are you asking whether, I mean -- I don't  
4 know. It probably was.

5 Q. And at the last sentence to this email is,  
6 Hans or -- last two sentences -- "Hans will get  
7 someone helping at Heritage. But our organizations  
8 are going to produce it, not the Commission." Do you  
9 see that?

10 A. It says that.

11 Q. And that's a reference to the Presidential  
12 Advisory Commission?

13 A. Yes.

14 Q. So is this email referencing what we had  
15 previously discussed as a white paper with Ken  
16 Blackwell?

17 A. No. This is discussing a report that we  
18 were going to do regarding all of the topics listed  
19 in this email.

20 Q. Right. And this was a report because the  
21 Presidential Advisory Commission was disbanded; is  
22 that right?

23 A. No.

24 Q. No? Okay. Then what was this report?

25 A. It says right here, "We are going to plug

<p style="text-align: right;">Page 226</p> <p>1 in factual specifics -- Virginia, New Jersey,  2 Pennsylvania, ACRU finding, deposition findings in  3 Starr, Heritage Data, testimony already heard,  4 whatever." That's what the report is going to  5 involve. It's all listed right there in the  6 document.  7 Q. Right. What was the purpose of this  8 report?  9 A. To publicize the existence of voter fraud  10 to rebut people like your plaintiffs' law firms who  11 say that doesn't exist or is minimized. That's  12 exactly what it was. Like the Southern Coalition for  13 Social Justice or the other plaintiffs' law firm.  14 Q. And you were going to produce this  15 report -- strike that.  16 And you were planning on producing this report  17 because the Presidential Advisory Commission was  18 disbanded; is that right?  19 A. No. I told you why, because we have a  20 free -- a right to freely associate with each other  21 and speak under the First Amendment about issues  22 important to us, and one of those issues are the  23 issues detailed here.  24 And so we had a right to engage in protected  25 First Amendment activity about the existence of</p>	<p style="text-align: right;">Page 227</p> <p>1 problems in the election system, and that's what we  2 were talking about.  3 Q. So your earlier testimony, when there was  4 a discussion about a white paper with Ken Blackwell,  5 is that something different than what's represented  6 here in this email?  7 A. I'm sorry. What was the question? The  8 existence of our previous --  9 Q. No. So your earlier testimony, when there  10 was a discussion about a white paper with Ken  11 Blackwell -- do you recall that testimony?  12 A. No, I don't.  13 Q. Well, when we were going through projects  14 that you may have had with Mr. Blackwell, you had  15 mentioned some work product, not attorney work  16 product, but some -- some written collaborative  17 project with Mr. Blackwell, right?  18 A. I said we may have signed some letters  19 together is what I believe my testimony was.  20 Q. Did you, Mr. Blackwell and Mr. von  21 Spakovsky draft the report that's indicated in this  22 email in front of you?  23 A. No.  24 Q. Have you worked with Mr. Blackwell on any  25 report, not an article or anything like that, any</p>
<p style="text-align: right;">Page 228</p> <p>1 sort of report?  2 A. Worked with Mr. Blackwell on any  3 report ...  4 Q. On election issues.  5 A. I've read his expert report in this case.  6 Q. No, I'm sorry, have you, before this case,  7 have you worked with Mr. Blackwell on any written  8 product other than the articles --  9 (Clarification by reporter.)  10 A. Probably yes.  11 Q. Do you recall any of them sitting here  12 today?  13 A. Well, one would be we have worked on a  14 variety of issues related to legislation in Congress,  15 and that would have included some sort of written  16 materials. That would be one example that I'm sure  17 we worked on in the past. I have some recollection  18 of that. In fact it would have related to  19 legislation in the House.  20 Q. What legislation?  21 A. I don't remember the bill number. It  22 related to election issues in the House.  23 Q. What time period?  24 A. 113th maybe.  25 MR. TEPE: I think we've been going for a</p>	<p style="text-align: right;">Page 229</p> <p>1 while. Just take a quick break?  2 MR. LOCKERBY: Okay.  3 VIDEO SPECIALIST: We are off the record,  4 3:57.  5 (Proceedings recessed)  6 VIDEO SPECIALIST: We are back on the  7 record, 4:10.  8 (VVA Exhibit 39 previously  9 marked for identification and  10 referenced herein: Email  11 correspondence from (topmost) N  12 Johnson sent 4/4/2017  13 PILF-ADAMS-0001408 - 0001410)  14 BY MR. TEPE:  15 Q. I'm handing the witness a document that's  16 been previously marked as VVA Exhibit 39, with the  17 Bates number, PILF Bates number of 1408.  18 Mr. Adams, do you recognize this as an email  19 string beginning with an email from Edgardo Cortes on  20 March 28th, 2017?  21 A. I see the document Exhibit 39 VVA.  22 Q. And you recognize this document, correct?  23 A. I see it. If I -- I mean, it's in front  24 of me, and I have just been handed the document.  25 Q. Okay. You can take a look at it.</p>

<p style="text-align: right;">Page 230</p> <p>1 A. Okay.</p> <p>2 Q. So, again, the email string begins with an</p> <p>3 email from Mr. Cortes dated March 28th, is that</p> <p>4 correct, of 2017?</p> <p>5 A. The document says that.</p> <p>6 Q. Okay. And Mr. Cortes wrote that this</p> <p>7 email is in response to your letter dated March 14,</p> <p>8 2017, correct?</p> <p>9 A. This email is in response ... right, the</p> <p>10 document says that.</p> <p>11 Q. Attached is a PDF of the VERIS Noncitizen</p> <p>12 Cancellation Report for the period January 1st, 2011</p> <p>13 to March 20th, 2017, correct?</p> <p>14 A. The document says that.</p> <p>15 Q. And then in response to this email from</p> <p>16 Mr. Cortes, Mr. Johnson responded, also on March</p> <p>17 28th, at 3:01 p.m. Do you see that?</p> <p>18 A. I see there's a response at 3:01 p.m. on</p> <p>19 March 28th.</p> <p>20 Q. And Mr. Johnson wrote, "Mr. Cortes, thank</p> <p>21 you for the report. Upon review, there appears to be</p> <p>22 15 jurisdictions missing. Does this mean those</p> <p>23 reports do not exist (i.e., no cancellations in the</p> <p>24 relevant time period) or were they inadvertently</p> <p>25 omitted?" Do you see that?</p>	<p style="text-align: right;">Page 231</p> <p>1 A. It says that.</p> <p>2 Q. And then there's a list of jurisdictions</p> <p>3 such as Buchanan County, for instance.</p> <p>4 A. Right.</p> <p>5 Q. So Mr. Cortes sends the VERIS Cancellation</p> <p>6 Report, Noncitizen Cancellation Report, and then</p> <p>7 Mr. Johnson notices that some jurisdictions are</p> <p>8 missing and asks, does this mean those reports do not</p> <p>9 exist, right?</p> <p>10 A. I think we just went through this. It</p> <p>11 says what it says.</p> <p>12 Q. And then Mr. Cortes -- and Mr. Johnson</p> <p>13 doesn't ask any questions other than that one, right?</p> <p>14 A. Not in VVA 39, perhaps elsewhere.</p> <p>15 Q. And Cortes responds to that question,</p> <p>16 right, on April 4th, 2017?</p> <p>17 A. Well, in part, he responded --</p> <p>18 Q. And he -- go ahead.</p> <p>19 A. No, go ahead.</p> <p>20 Q. And he said, "Mr. Johnson, sorry for the</p> <p>21 brief delay, but I wanted my IT folks to go back and</p> <p>22 confirm my understanding. The 15 jurisdictions you</p> <p>23 listed do not have any records meeting the criteria</p> <p>24 for the report." Do you see that?</p> <p>25 A. It says that.</p>
<p style="text-align: right;">Page 232</p> <p>1 Q. Did you personally speak with Department</p> <p>2 of Elections IT folks?</p> <p>3 A. Boy ... highly unlikely, but I have some</p> <p>4 recollection of communicating with IT folks at the</p> <p>5 Virginia Department of Elections at some point.</p> <p>6 Q. And when was that?</p> <p>7 A. I don't remember. I just know that, if</p> <p>8 you were to ask me have you ever in your life spoken</p> <p>9 to IT people at the Virginia Department of Elections,</p> <p>10 my answer would be almost certainly yes.</p> <p>11 Q. Okay. Did you talk to IT folks with</p> <p>12 regard to the question Mr. Johnson asked here?</p> <p>13 A. Highly unlikely.</p> <p>14 Q. Do you know if anyone at PILF spoke with</p> <p>15 any of the IT folks at the Virginia Department of</p> <p>16 Elections with regard to Mr. Johnson's question here?</p> <p>17 A. That's significantly more likely to have</p> <p>18 happened than Christian Adams speaking with these</p> <p>19 individuals, but I do not know the answer to your</p> <p>20 question.</p> <p>21 Q. You're not aware of any sitting here</p> <p>22 today?</p> <p>23 A. Sitting here today I'm not aware of it.</p> <p>24 But, that being said, I have a pretty clear</p> <p>25 recollection that --</p>	<p style="text-align: right;">Page 233</p> <p>1 Q. There's no question pending.</p> <p>2 A. Well, this is the answer to my last --</p> <p>3 your last question.</p> <p>4 MR. LOCKERBY: Objection. There is a</p> <p>5 question pending. There's an answer pending too, but</p> <p>6 you cut it off.</p> <p>7 A. I have some recollection of Mr. Johnson or</p> <p>8 somebody speaking to somebody in that office besides</p> <p>9 Edgardo Cortes.</p> <p>10 Q. At some point.</p> <p>11 A. At some point. That may or may not have</p> <p>12 been IT folks.</p> <p>13 Q. And then in the rest of this response from</p> <p>14 Mr. Cortes he refers to whether people are in</p> <p>15 canceled status or in active status, is that right,</p> <p>16 on the list that he provided?</p> <p>17 MR. LOCKERBY: Object to the form.</p> <p>18 A. I don't think he does. I don't think that</p> <p>19 is right.</p> <p>20 Q. Okay. Well, let's read it. So he says --</p> <p>21 he continues on, "this report shows individuals that</p> <p>22 were canceled due to self-reported noncitizen status</p> <p>23 and failed to complete an affirmation of citizenship</p> <p>24 in the allotted time frame, continued to be in</p> <p>25 canceled status."</p>

1 A. That's what it says.

2 Q. So he's talking about people in canceled  
3 status with respect to their voter registration,  
4 correct?

5 A. Well, I can't speak -- I suspect that  
6 Mr. Cortes offered in answer to your question that he  
7 was more competent to answer than I am right now as  
8 to what he meant.

9 I can tell you what it says on the page, and I  
10 can tell you what I thought it meant, but I can't  
11 tell you what Mr. Cortes might have to say.

12 Q. And then he continues, "if an individual  
13 was previously canceled and then subsequently  
14 affirmed citizenship and was reregistered, they would  
15 no longer appear on this report because they would  
16 now be on active status." Do you see that?

17 A. The email in VVA 39 says that.

18 Q. And those individuals who -- no, "those  
19 individuals would show on the earlier custom report  
20 you have. Let us know if there are any additional  
21 questions. Thanks."

22 Okay. That's the content of his email on  
23 April 4th at 10:04 p.m., correct?

24 A. The document says that.

25 Q. He does not refer to whether people on the

1 cancellation list are citizens or noncitizens, does  
2 he?

3 MR. LOCKERBY: Object to the form.

4 A. He does. He does. And one cannot  
5 disconnect the context and the procedures associated  
6 with the generation of this report from what he says.  
7 He most certainly does refer to noncitizens. More  
8 than just noncitizens -- self-reported noncitizens --  
9 which has more weight in my view than a noncitizen  
10 that the Commonwealth has determined to be a  
11 noncitizen.

12 Q. He doesn't use the term "aliens" anywhere  
13 in this email, does he?

14 MR. LOCKERBY: Object to the form.

15 A. He uses a synonym.

16 Q. He doesn't refer to whether people are  
17 legal or illegal registrants, does he?

18 A. Wait. Did you say he doesn't refer to  
19 whether or not they are legal or illegal what?

20 Q. Registrants. He does not refer to whether  
21 people on the cancellation list are legal or illegal  
22 registrants, does he.

23 A. Well --

24 MR. LOCKERBY: Object to the form.

25 A. -- one can make a reasonable inference

1 that, if they swore falsely on the registration form,  
2 that they were illegal registrants, absolutely,  
3 and --

4 Q. But he -- are you done? But he in his  
5 email does not refer to whether people are legal or  
6 illegal registrants himself.

7 MR. LOCKERBY: Object to the form.

8 Q. Is that right?

9 A. It is -- I would disagree slightly to  
10 that, because he is very explicitly saying that they  
11 were canceled due to self-reported noncitizen status,  
12 which presupposes they got on the rolls in the first  
13 place by dishonestly filling out a form that they had  
14 to attest to under penalty of perjury.

15 While it's true that he doesn't say illegal  
16 registrants, that's the reasonable inference from the  
17 facts presented by Mr. Cortes in this email that they  
18 illegally registered in the first place.

19 Q. He does not refer to whether people  
20 committed or did not commit felonies, does he?

21 A. By implication, yes.

22 Q. He does not use those terms.

23 A. He doesn't use the word "felony," but he  
24 says everything else a reasonable person with common  
25 sense would require to ascertain whether or not a

1 crime may have been committed.

2 Q. And so this -- he says this report shows  
3 individuals that were canceled due to self-reported  
4 noncitizen status and failed to complete an  
5 affirmation of citizenship in the allotted time  
6 frame, right?

7 A. That's what the document says.

8 Q. Right. And this is referring to a list  
9 that shows people who did not respond with an  
10 affirmation of citizenship within two weeks of  
11 receiving a notice of intent to cancel, correct?

12 MR. LOCKERBY: Object to the form.

13 A. And there's more to your -- that you left  
14 out of your question.

15 Q. But -- but that is --

16 MR. LOCKERBY: Objection. He ought to be  
17 allowed to finish his answer.

18 Q. Go ahead.

19 A. These are people who first gave false  
20 information to an election official at least once,  
21 and most recently would have said, under penalty of  
22 perjury, that they were not an American citizen, and  
23 they would have attested to that and made an  
24 affirmative checkbox to that, and then the state, the  
25 Commonwealth, would have gone to the trouble of

<p style="text-align: right;">Page 238</p> <p>1 mailing them an opportunity to correct the record, 2 and they never replied. 3 Q. Within two weeks. 4 A. That's the law. 5 MR. LOCKERBY: Objection. 6 Q. And you can -- but you can reregister 7 after that two-week time period. You know that, 8 right? 9 A. Wait. Who can reregister? 10 Q. The person who was canceled. 11 A. Not necessarily. 12 Q. That is an option. 13 A. Not always. 14 Q. Well, I'm not asking if it's always the 15 situation, but that is an option. If you fill out, 16 you know, a new registration, for example, and affirm 17 your citizenship, you may be back on the voter rolls, 18 right? 19 A. Right, but your question was whether or 20 not you can just do it willy-nilly, and the answer is 21 no. If you're not a citizen in the first place, for 22 whom these individuals were not, then, no, you can't 23 just reregister to vote. You're not a citizen of the 24 United States. And that's just federal law. It's 25 also state law.</p>	<p style="text-align: right;">Page 239</p> <p>1 Q. And so Mr. Cortes does not use the word 2 "felonies" in this email, right? 3 MR. LOCKERBY: Objection, asked and 4 answered. The document speaks for itself. 5 Q. Withdrawn. And at the top of the document 6 Mr. Johnson forwards the previous email chain to you 7 and he says, with respect to Mr. Cortes, he just 8 confirms what we already knew. The report includes 9 only people who are flagged then sent an affirmation 10 and did not return it, correct, that's what he says? 11 MR. LOCKERBY: Objection. 12 MR. TEPE: What's the objection? 13 MR. LOCKERBY: That's not what it says. 14 MR. TEPE: What did I misread? 15 MR. LOCKERBY: And failed to complete an 16 affirmation of citizenship in the allotted time frame 17 and continued to be canceled status. 18 MR. TEPE: That's not what he wrote. The 19 quotation here is what I read. "Otherwise he just 20 confirms what we already knew -- the report includes 21 only people who were flagged, then sent an 22 affirmation and did not return it," period. 23 Q. That's what Mr. Johnson wrote to you, 24 correct? 25 A. Mr. Johnson's email in Deposition Exhibit</p>
<p style="text-align: right;">Page 240</p> <p>1 39 in a VVA dep says what it says. I can't add to it 2 or subtract from it. 3 Q. And you don't disagree with what 4 Mr. Johnson wrote, do you, that one sentence I just 5 quoted? 6 A. Well, I think that there's certain things 7 he left out, but I have no reason to -- I am unable 8 to find something -- I don't know about the part he 9 confirms what we already knew. I do dispute that a 10 little bit. I didn't know what Mr. Cortes writes 11 down below in the April 4th, 10:04 a.m. email, I 12 didn't already know that. 13 I was stunned, frankly, that it was so cut and 14 dried after his email where all of the -- all of the 15 Linda Lindberg, Arlington registrar, complaints about 16 the data were exposed to be inaccurate. 17 Q. Well, you never actually checked the list 18 that Mr. Cortes sent over against all the records 19 from the jurisdictions that showed people who had 20 reregistered yet were still on the cancellation list. 21 MR. LOCKERBY: Object to the form. 22 A. Mr. Cortes very specifically, as the chief 23 election officer of the state, said the people on the 24 report he sent us were canceled as declared 25 noncitizens and did not reregister, period.</p>	<p style="text-align: right;">Page 241</p> <p>1 Q. And you never checked the records of the 2 registrars that they sent to you against the report 3 that Mr. Cortes sent to you. 4 A. I personally did not. 5 Q. And did anyone at PILF? 6 A. I think you asked that last week, and I 7 don't remember the answer. 8 Q. You can put that document aside. 9 (Adams Exhibit 37 marked for 10 identification: Email correspondence 11 from (topmost) C Adams sent 2/6/2017 12 PILF-ADAMS-0051839) 13 Q. The court reporter has marked as Exhibit 14 37 a document with the Bates number 51839. Do you 15 recognize this document? 16 A. I see this, yes. 17 Q. It's an email that you wrote on February 18 6th, 2017 to Mr. Churchwell? 19 A. It is. 20 Q. And it concerns a draft letter to the 21 Virginia Senate Elections Committee; is that right? 22 A. Well, let me see if it references that. 23 Q. In the subject line. 24 A. In the subject line ... you're not showing 25 me the letter, are you? I mean, that's not in the</p>

<p style="text-align: right;">Page 242</p> <p>1 exhibit you've handed me.</p> <p>2 Q. Right, that's correct. You responded that</p> <p>3 the letter needs to be fine-tuned. You state, "we</p> <p>4 framed the Virginia study in a way that protects us."</p> <p>5 The Virginia study is Alien Invasion I, correct?</p> <p>6 A. I don't know. It doesn't say that.</p> <p>7 Q. But that is what you're referring to, yes?</p> <p>8 A. It probably is. I don't remember. I</p> <p>9 can't imagine what else it could be, but there could</p> <p>10 be something else. It might be referring to the</p> <p>11 process of collecting data. It might be referring to</p> <p>12 the -- I mean, if you have the letter itself, I would</p> <p>13 better be able to be answer -- better be able to</p> <p>14 answer this question.</p> <p>15 (Adams Exhibit 38 marked for</p> <p>16 identification: Public Interest</p> <p>17 Legal Foundation   Letter dated</p> <p>18 February 7, 2017 to Chairwoman</p> <p>19 Holtzman Vogel)</p> <p>20 Q. The court reporter has marked as Exhibit</p> <p>21 38 a letter of Logan Churchwell dated February 7th,</p> <p>22 2017 to Chairwoman Holtzman Vogel of the Virginia</p> <p>23 Senate, correct?</p> <p>24 A. That's what it says.</p> <p>25 Q. And this is the letter that was being</p>	<p style="text-align: right;">Page 243</p> <p>1 referenced as being drafted in Exhibit 37?</p> <p>2 A. That's your assertion to me?</p> <p>3 Q. I'm asking you.</p> <p>4 A. Oh.</p> <p>5 Q. Isn't this -- I'm sorry. Isn't this</p> <p>6 letter the letter that's being referenced in Exhibit</p> <p>7 37?</p> <p>8 A. Well, it could or could not be. I don't</p> <p>9 know. It's clearly a day later.</p> <p>10 Q. It's clearly a letter to the Virginia</p> <p>11 Senate Elections Committee?</p> <p>12 A. Right. The question is whether it was the</p> <p>13 attachment to Plaintiff's or to Adams 37, and I don't</p> <p>14 know the answer to that. I just know that it's -- 38</p> <p>15 is, Exhibit 38 is a letter to Chairwoman Vogel.</p> <p>16 Q. Right. And actually the question that</p> <p>17 this letter is being provided to refresh your</p> <p>18 recollection of is your statement, "we framed the</p> <p>19 Virginia study in a way that protects us," and, as</p> <p>20 you can see from the letter to Chairwoman Holtzman</p> <p>21 Vogel, this letter refers to the Alien Invasion I</p> <p>22 report, correct?</p> <p>23 A. It does seem to do that.</p> <p>24 Q. And so I just wanted to establish that,</p> <p>25 when you say in your email here in Exhibit 37, "we</p>
<p style="text-align: right;">Page 244</p> <p>1 framed the Virginia study," you're not talking about</p> <p>2 something other than Alien Invasion I.</p> <p>3 A. Well, let me be sure about that. No,</p> <p>4 there's items in here that go beyond Alien I. I</p> <p>5 think the second page, the paragraph that begins</p> <p>6 "Virginia's weak record" gets into matters that are</p> <p>7 historical in nature. So I don't think it's accurate</p> <p>8 to say everything in this letter relates to Alien I.</p> <p>9 Q. That wasn't the question.</p> <p>10 A. Well, maybe you should repeat it. I'm</p> <p>11 sorry.</p> <p>12 Q. The question is, in Exhibit 37, the</p> <p>13 Virginia study that you referenced in your email</p> <p>14 refers to Alien Invasion I, correct, and nothing</p> <p>15 else?</p> <p>16 A. Probably, but there's a chance it doesn't.</p> <p>17 Q. Why do you say there's a chance it</p> <p>18 doesn't?</p> <p>19 A. Well, I just told you, I think there's</p> <p>20 things in here that do not relate to Alien I that</p> <p>21 relate to Virginia and a study in Virginia, and so we</p> <p>22 can --</p> <p>23 Q. All right.</p> <p>24 A. I mean, just there may be something</p> <p>25 contained in that that's more than Alien I but --</p>	<p style="text-align: right;">Page 245</p> <p>1 Q. Probably not?</p> <p>2 A. -- probably not.</p> <p>3 Q. Your email on -- that's before you in</p> <p>4 Exhibit 37 said that the report did not list, quote,</p> <p>5 "noncitizens on the voter rolls," closed quote. Do</p> <p>6 you see that?</p> <p>7 A. It says that.</p> <p>8 Q. And, again, would you agree that the</p> <p>9 report is referencing Alien Invasion I?</p> <p>10 A. Probably.</p> <p>11 Q. If the report had referred to the listed</p> <p>12 individuals as noncitizens, that would be legally</p> <p>13 problematic; is that right?</p> <p>14 A. Well, I think at this --</p> <p>15 Q. For PILF.</p> <p>16 A. -- what I'm telling him to -- I'm telling</p> <p>17 him to change that terminology in this letter to --</p> <p>18 remember, this happened after the testimony that Noel</p> <p>19 Johnson provided to Chairman Vogel's committee, and</p> <p>20 my suggestion to him was to utilize the term</p> <p>21 registrants who are canceled for citizenship problems</p> <p>22 according to election officials. Both are</p> <p>23 defensible, both are accurate, but I suggested he use</p> <p>24 the second, not the first.</p> <p>25 Q. You said both are accurate?</p>

<p style="text-align: right;">Page 246</p> <p>1 A. Yes.</p> <p>2 Q. And so in your mind there's no</p> <p>3 distinguishing between saying noncitizens on the</p> <p>4 voter rolls and saying registrants who are canceled</p> <p>5 for citizenship problems according to election</p> <p>6 officials?</p> <p>7 A. Well, I think it's important to tell</p> <p>8 people whose fault this is, and the primary</p> <p>9 difference is that election officials are the ones</p> <p>10 telling us that these were noncitizens.</p> <p>11 Q. Well, in the following sentence you say,</p> <p>12 "there's a big difference between the two and shifts</p> <p>13 risk of error onto government officials." You wrote</p> <p>14 that, right?</p> <p>15 A. It says that.</p> <p>16 Q. So at the time you thought there was a big</p> <p>17 difference between a report stating the individuals</p> <p>18 are noncitizens on the voter rolls and stating that</p> <p>19 there are registrants who were canceled for citizen</p> <p>20 ships; is that correct?</p> <p>21 A. I prefer to cite the government documents</p> <p>22 and rely on the government documents and the</p> <p>23 reasonable inferences associated with those</p> <p>24 government documents.</p> <p>25 In this email I am instructing Mr. Churchwell</p>	<p style="text-align: right;">Page 247</p> <p>1 to do as I just suggested, to rely on government</p> <p>2 records, to draw reasonable inferences from those</p> <p>3 records.</p> <p>4 Q. But whether it's noncitizens or</p> <p>5 registrants who were canceled for citizenship</p> <p>6 problems, you think they're both accurate?</p> <p>7 A. According to government records, yes. Now</p> <p>8 were there ever cases to the contrary? Almost</p> <p>9 certainly. But I think that these are both accurate</p> <p>10 statements given the facts of the case.</p> <p>11 Q. I think you can put that document aside.</p> <p>12 Actually I have another question about that document,</p> <p>13 if you could put it back in front of you.</p> <p>14 A. There were two documents. Which one?</p> <p>15 Q. Exhibit 38 -- I'm sorry -- 37. When you</p> <p>16 said, "we framed the Virginia study in a way that</p> <p>17 protects us," protects PILF, I assume you're saying,</p> <p>18 protects us? Who is the "us"?</p> <p>19 A. Well, anybody who -- who -- you can't read</p> <p>20 that out of context with the next statement or the</p> <p>21 next sentence. We deliberately avoided a Greg</p> <p>22 Phillips style overstatement. That will tell you who</p> <p>23 us is.</p> <p>24 Greg Phillips made some statement to the media</p> <p>25 that a individual did something in San Francisco, and</p>
<p style="text-align: right;">Page 248</p> <p>1 I forget the particulars, but the person involved</p> <p>2 wasn't even associated with the underlying event.</p> <p>3 And this was fresh at the time, and I wanted it to be</p> <p>4 an example for Logan to take to heart that you can't</p> <p>5 do the things Greg Phillips did in that particular</p> <p>6 instance.</p> <p>7 Q. Okay. Strike as nonresponsive.</p> <p>8 My question is, you state "in a way that</p> <p>9 protects us." Who is the "us"?</p> <p>10 A. Well, I answered you by telling you us,</p> <p>11 why, contextually, the second -- the next sentence is</p> <p>12 important, because I wanted Logan to be aware of what</p> <p>13 not to do as relates to something that Greg Phillips</p> <p>14 just did, and I don't know who us is other than</p> <p>15 giving you that answer that there's two people on</p> <p>16 this email, but I don't know.</p> <p>17 Q. Didn't you intend by "us" to say PILF, we</p> <p>18 framed the Virginia study in a way that protects</p> <p>19 PILF?</p> <p>20 A. I don't know. There's a number of</p> <p>21 different ways to interpret this that I don't</p> <p>22 remember what I was meaning at the time, other than</p> <p>23 the importance in the context of the next sentence.</p> <p>24 Q. And what did it protect us from?</p> <p>25 A. Complete, total screw-ups like Greg</p>	<p style="text-align: right;">Page 249</p> <p>1 Phillips had just done.</p> <p>2 Q. You can put that document aside.</p> <p>3 The complaint in this litigation was filed on</p> <p>4 April 12th, 2018. Do you recall that?</p> <p>5 A. Whatever it says. I have no reason to</p> <p>6 disagree with you as I sit here. If you want to show</p> <p>7 me the complaint, I can adopt that date, but I just</p> <p>8 don't know.</p> <p>9 Q. Since this lawsuit was filed, PILF has</p> <p>10 continued to issue reports on election issues?</p> <p>11 A. Absolutely.</p> <p>12 Q. And has continued to issue reports on</p> <p>13 purported noncitizen registration and voting, yes?</p> <p>14 A. Yes. I assume that's a 30(b)(6) question?</p> <p>15 Q. Sure, we can consider it a 30(b)(6)</p> <p>16 question.</p> <p>17 MR. LOCKERBY: To what topic does it</p> <p>18 pertain?</p> <p>19 (Adams Exhibit 39 marked for</p> <p>20 identification: Stealing the Vote  </p> <p>21 Allegheny County, PA Reveals How</p> <p>22 Citizenship Verification Protects</p> <p>23 Citizens and Immigrants Alike)</p> <p>24 Q. Well, whether it's 30(b)(6) or in your</p> <p>25 personal capacity --</p>



1 A. Well, that would change the answer.

2 Q. It shouldn't.

3 A. It does. I haven't issued any reports on  
4 noncitizen voting that I can think of. This is a  
5 PILF report you've handed me as Exhibit 39.

6 Q. Which you're incapable of providing  
7 testimony of even though you're the president of  
8 PILF?

9 A. If you're asking me a 30(b)(6) question,  
10 ask it.

11 MR. LOCKERBY: He can provide testimony  
12 regardless, but the issue is whether it's within the  
13 scope of a 30(b)(6) topic, which affects his duty to  
14 prepare to testify about it as well as the import of  
15 the response. That's why it's important to identify  
16 on the record whether this is within the scope of a  
17 30(b)(6) topic, and, if so, which one.

18 MR. TEPE: I don't have the 30(b)(6)  
19 topics listed in front of me, but I can tell you that  
20 the questions do not really go into the details of  
21 this report as much as differences between this and  
22 the Alien Invasion reports. So it's part of the  
23 Alien Invasion topics.

24 MR. LOCKERBY: Well, it sounds as if it  
25 may be within the penumbras, arguably, of a topic,

1 but, in any event, we don't -- without identification  
2 on the record that -- as to which 30(b)(6) topic it's  
3 within and why, that does affect his answer because  
4 his individual answer would be based on memory, his  
5 30(b)(6) answer could be based on something else.

6 So, absent some identification, I'm going to  
7 assume it's not within the scope of a particular  
8 topic.

9 MR. TEPE: Well, while my colleague looks  
10 to get a copy of the 30(b)(6) notice to refresh my  
11 recollection, I'll just ask the question.

12 MR. LOCKERBY: I had some exhibits  
13 delivered here, I think, this morning, which should  
14 include the 30(b)(6) topics.

15 MS. CLEMINSHAW: The box is right over  
16 here.

17 MR. LOCKERBY: Right. Yes.

18 MR. TEPE: Do you want to go off the  
19 record?

20 MR. LOCKERBY: Yes.

21 VIDEO SPECIALIST: We are off the record,  
22 4:45.

23 (Proceedings recessed)

24 VIDEO SPECIALIST: We are back on the  
25 record, 4:46.

1 BY MR. TEPE:

2 Q. The questions, which I will be asking, I  
3 believe are covered under Topic 2, which is your  
4 activities, communications relating purported  
5 noncitizen registration voting in Virginia, the Alien  
6 Invasion report, et cetera.

7 Again, my questions are not so much about this  
8 report, but differences between this report and the  
9 Alien Invasion report.

10 MR. LOCKERBY: I think we'll have to hear  
11 the specific questions, but, on its face, this report  
12 deals with Allegheny County, Pennsylvania not  
13 Alleghany County, Virginia, and so we don't  
14 necessarily agree, but ask the questions and we'll  
15 see where it goes.

16 Q. Okay. So after the complaint was filed in  
17 this LULAC lawsuit, you, PILF, published a report  
18 called "Steeling the Vote," correct? That's in front  
19 of you?

20 A. Right. I'm looking for a date on here,  
21 July 18 ... right.

22 Q. And this concerns Allegheny, Pennsylvania,  
23 is that right, this report Steeling the Vote?

24 A. That's what the face of it says.

25 Q. And like the Alien Invasion reports, PILF

1 relied on NVRA requests to collect data; is that  
2 right?

3 A. Well, there was a lot of differences  
4 between the collection of data between the two  
5 projects.

6 Q. Okay. But my question is, you relied on  
7 NVRA requests to collect data for the Steeling the  
8 Vote report, correct?

9 A. I believe NVRA requests were made.

10 Q. And NVRA requests were made to collect  
11 records for the Alien Invasion reports, correct?

12 A. Right.

13 Q. This report has exhibits, voter  
14 registration records, for certain individuals; is  
15 that right?

16 A. I'm not -- I mean, I think there are.  
17 Yeah, it has a variety of information --

18 Q. Right, including --

19 A. -- including that.

20 Q. Right. So it's right in front of you, the  
21 exhibits to the report include voter registration  
22 records for certain individuals, yes?

23 A. I think I just answered that.

24 Q. So it was yes.

25 A. It was what it was. I said --

1 Q. You said "including that."

2 A. Well, "including that" is a pretty good  
3 indication that what you asked me about is included.

4 Q. Right, but I'm not asking for indications;  
5 I'm asking for direct answers to my questions.

6 And my question was, this report has as  
7 exhibits voter registration records for certain  
8 individuals; is that right?

9 A. It has voter registration records for  
10 registrants, yes.

11 Q. Now the records that are attached to  
12 Steeling the Vote have the last name of the  
13 registrants redacted; is that right?

14 A. Could you direct me to a particular page?

15 Q. Well, you can look at any of the exhibits  
16 to -- the report doesn't have these exhibits  
17 numbered.

18 A. Is there a Bates number?

19 Q. No, because this was not produced.

20 A. Okay. Well, then, to answer your question  
21 completely, it would take me to go through every  
22 page, which I'm happy to do.

23 Q. You got one right in front of you.

24 A. And so you're directing me to do that.

25 Q. No, you have one of the voter registration

1 records.

2 A. Okay. I have one in front of me, correct.

3 Q. Right. The last name is redacted?

4 A. Right.

5 Q. The address is redacted?

6 A. Well, that's less clear, because I'm --  
7 right, right, it is. It's in a strange, old-style  
8 computer window, and so it's hard to navigate around.

9 Q. And so you were able to publish Steeling  
10 the Vote using voter registration records that  
11 redacted the last name and the address, correct?

12 A. I mean, the document speaks for itself,  
13 and I'm not sure -- are you asking me in a 30(b)(6)  
14 capacity?

15 Q. Yes. PILF was able to publish Steeling  
16 the Vote using voter registration records that  
17 redacted the last name and address, correct?

18 A. The document speaks for itself. They are  
19 redacted.

20 MR. LOCKERBY: I'm going to register an  
21 objection to the form of the question to the extent  
22 that it assumes that PILF should have somehow -- that  
23 PILF did the redacting and that PILF should have  
24 somehow altered government records.

25 Q. You can put this document aside.

1 A. You didn't ask me who redacted it.

2 Q. Would you know the answer to that?

3 A. Are you asking?

4 Q. Would you know the answer to that?

5 A. I don't.

6 (Adams Exhibit 40 marked for  
7 identification: Motor Voter Mayhem |  
8 Michigan's Voter Rolls in Disrepair)

9 Q. The court reporter has marked and handed  
10 to you Exhibit 40. Do you recognize this document?

11 A. This is "Motor Voter Mayhem." It's a  
12 report done regarding Michigan.

13 Q. It was done in October of 2018?

14 A. That's what the date says on page 2.

15 Q. And in the report you included case  
16 studies for certain individuals; is that correct?

17 A. What page are you on?

18 Q. Well, page 9, for example.

19 A. Okay. I'm on page 9.

20 Q. And so on page 9 there is excerpts of  
21 certain government records; is that right?

22 A. There are on page 9 two different excerpts  
23 of election list maintenance records.

24 Q. And the records that we see here on page 9  
25 have the individual's first name redacted; is that

1 right?

2 A. It appears to.

3 Q. And it has address redacted?

4 A. Well, I don't know. It's redacted. It  
5 doesn't have a subject header anywhere, so I don't  
6 know what it is.

7 Q. Well, certainly the record at the bottom  
8 has name, right, and then has a residence?

9 A. It says residence, colon, redaction.

10 Q. Right. And then on page 10 you have  
11 another individual case study, correct?

12 A. Case study number 2 on page 10.

13 Q. The individual's first name is redacted?

14 A. No, it does not appear -- well, it's  
15 abbreviated, I guess.

16 Q. Okay. So, yes, it's abbreviated in the  
17 text of your report, but it's redacted in the records  
18 that are copied.

19 A. Right. The record below the name is  
20 redacted.

21 Q. And then in the records there appears to  
22 be the address redacted. It says, registered as,  
23 seems to be the first name redacted, Savina at  
24 redacted (Sterling Heights City). Do you see that?

25 A. I do, but I just see it says Sterling

<p style="text-align: right;">Page 258</p> <p>1 Heights City. That -- that can mean a lot of</p> <p>2 different things there.</p> <p>3 Q. Right, but the redaction before that is an</p> <p>4 address, is it not?</p> <p>5 A. I don't know. It could or could not be.</p> <p>6 There's a lot of different possibilities.</p> <p>7 Q. And so PILF published Motor Voter Mayhem</p> <p>8 with redactions of both names and addresses, correct?</p> <p>9 A. Right. The document speaks for itself.</p> <p>10 There's redactions in it.</p> <p>11 Q. You can put that aside.</p> <p>12 (Johnson Exhibit 36</p> <p>13 previously marked for identification</p> <p>14 and referenced herein: Email</p> <p>15 correspondence from (topmost) C</p> <p>16 Adams sent 8/15/2018 with attachment</p> <p>17 PILF-ADAMS-0000250 - 0000270)</p> <p>18 Q. The court reporter -- strike that.</p> <p>19 I've handed the witness what has been</p> <p>20 previously marked as Johnson 36. Do you recognize</p> <p>21 this document?</p> <p>22 A. Well, it's a long document, so give me a</p> <p>23 moment. Sorry. What was your question?</p> <p>24 Q. Do you recognize this document?</p> <p>25 A. Well, it appears to -- (pardon me) -- it</p>	<p style="text-align: right;">Page 259</p> <p>1 appears to be a draft markup of a report.</p> <p>2 Q. And that report is called "Safe Spaces";</p> <p>3 is that right?</p> <p>4 A. The attachment says "Sanctuary Draft."</p> <p>5 I'm not sure that -- let me see if it says Safe</p> <p>6 Spaces on it. I don't see that. If you could direct</p> <p>7 me to where it says that, I -- I don't see it.</p> <p>8 (Adams Exhibit 41 marked for</p> <p>9 identification: Email correspondence</p> <p>10 from (topmost) N Johnson sent</p> <p>11 8/21/2018 with attachment</p> <p>12 PILF-ADAMS-0007747 - 0007779)</p> <p>13 Q. The court reporter has marked as Exhibit</p> <p>14 41 a document with the Bates number beginning 7747.</p> <p>15 A. I have that document, 41.</p> <p>16 Q. And in document or Exhibit 41 Noel Johnson</p> <p>17 sends to you and others the final print and ready</p> <p>18 version of Safe Spaces on August 21st, 2018?</p> <p>19 A. That's what it says on the document.</p> <p>20 Q. And so this was PILF's report called Safe</p> <p>21 Spaces, how sanctuary cities are giving coverage to</p> <p>22 noncitizens on the voter rolls.</p> <p>23 A. Well, I mean, there was a report published</p> <p>24 that said that, that referenced the topic that you're</p> <p>25 asking me about. I -- I mean, what is your question?</p>
<p style="text-align: right;">Page 260</p> <p>1 I'm sorry.</p> <p>2 Q. Well, this is to refresh your recollection</p> <p>3 that the document that we were looking at previously</p> <p>4 as Johnson 36 are your edits and comments to what</p> <p>5 became the Safe Spaces report of PILF.</p> <p>6 A. Okay.</p> <p>7 Q. Do you agree with that?</p> <p>8 A. I don't -- I mean, I don't disagree. It</p> <p>9 sounds -- sounds correct.</p> <p>10 Q. In the cover email that you sent on August</p> <p>11 15th here in Johnson 36, you wrote, "Virginia has got</p> <p>12 to be fixed throughout. I have a stark comment in</p> <p>13 the edits about this."</p> <p>14 A. It says that.</p> <p>15 Q. If you go towards the back of the draft</p> <p>16 attachment, you'll see a section on Virginia.</p> <p>17 A. I'm sorry. Do you have a page number?</p> <p>18 Q. Oh, certainly. It's beginning on Bates</p> <p>19 number 267 continuing on to 268.</p> <p>20 A. 267, got it.</p> <p>21 Q. And so this portion of what would</p> <p>22 eventually be called the Safe Spaces report talks</p> <p>23 about certain jurisdictions in Virginia, yes?</p> <p>24 A. Gosh. Right.</p> <p>25 Q. I want to direct your attention to the</p>	<p style="text-align: right;">Page 261</p> <p>1 page with the Bates 268 at the top.</p> <p>2 A. Bates 268, right.</p> <p>3 Q. The second paragraph, there are some</p> <p>4 edits, do you see that, and a comment?</p> <p>5 A. There's edits and comments, yes.</p> <p>6 Q. So the paragraph reads, Virginia -- and</p> <p>7 I'm going to read it first as it was, and then I'll</p> <p>8 read it as edited, okay?</p> <p>9 So it reads, "Virginia currently contains</p> <p>10 three sanctuary jurisdictions -- all of which</p> <p>11 disclosed records of noncitizens previously</p> <p>12 registered and voting therein," period.</p> <p>13 So that was the former language. Do you see</p> <p>14 that?</p> <p>15 A. I'm sorry. Did you say "formal" language?</p> <p>16 Q. "Former." I'm sorry.</p> <p>17 A. Are you from Philadelphia?</p> <p>18 Right, I see it, former language.</p> <p>19 Q. And the language, "noncitizens previously</p> <p>20 registered and voting therein" was struck and</p> <p>21 replaced with "registrants canceled for citizenship</p> <p>22 defects." Do you see that?</p> <p>23 A. I see that.</p> <p>24 Q. And that was your edit, correct?</p> <p>25 A. I don't know. Is there a way to tell</p>

1 that?

2 Q. Well, we can look at the comment.

3 A. Because there's multiple people editing  
4 this.

5 Q. Right. Let's look at the comment, [CA18].

6 A. Right.

7 Q. And in previous testimony you said CA  
8 refers to Christian Adams?

9 A. There you go.

10 Q. And you wrote in the comment:

11 "How is it after we are involved in  
12 litigation that we are still  
13 referring to these Virginia cases  
14 as, quote, noncitizens? It defies  
15 explanation. On numerous occasions  
16 in numerous places I have explicitly  
17 said their registration is removed  
18 for citizen defects or registrants  
19 canceled for reasons of  
20 noncitizenship. We have to use the  
21 actual terms and not make  
22 assumptions they are necessarily  
23 aliens."

24 Do you see that?

25 A. It says that.

1 aware of relating to this litigation.

2 And as I have testified, I believe,  
3 previously, I have no reason to dispute the fact that  
4 Mr. Bonilla is a citizen of the United States. And I  
5 feel bad for Mr. Bonilla, among other things, that he  
6 had to be badgered by Mr. Levitt. And I feel bad  
7 that he was included in the list of people who were  
8 canceled. And I feel bad, as you know, I think, that  
9 Mr. Bonilla was canceled because we attempted to sue  
10 the Commonwealth of Virginia to fix that problem, and  
11 you, your firm, opposed those efforts and still do.

12 And so by, I think this is August of '18, I  
13 wanted our language to reflect the fact that we were  
14 aware, for example, of Mr. Bonilla. So that's  
15 exactly what it represents.

16 Q. When you said, "we attempted to sue the  
17 Commonwealth of Virginia to fix that problem," are  
18 you referring to your attempt to in this litigation  
19 implead the Virginia Department of Elections as a  
20 third-party defendant?

21 A. Well, I was mistaken in my  
22 characterization of an attempt. We in fact did sue  
23 the Commonwealth of Virginia, as far as I understand,  
24 interpleader practice, which might not be very much,  
25 that we filed an action against the Commonwealth of

1 Q. "The continuing improper terminology  
2 contribute to us losing the motion to dismiss because  
3 the court ruled that these subsequent statements were  
4 republications within the statute of limitations."

5 That's what you wrote in your comment,  
6 correct?

7 A. That's what it says.

8 Q. Okay. So when you were editing Safe  
9 Spaces, it was your opinion that calling people  
10 listed in the VERIS cancellation reports, noncitizens  
11 was improper terminology, yes?

12 MR. LOCKERBY: Object to the form of the  
13 question.

14 A. It all depends on the context and the time  
15 that the statements were made. By October of '18, I  
16 think that's when this was, or by -- again, I'm not  
17 sure the exact date.

18 Q. Well, the edits were made in August.

19 A. August? By August of '18, my desire to  
20 have language in reports that reflected the facts as  
21 we knew them at that moment was very important to me,  
22 and by that time we had become acquainted with the  
23 likes of Abby Jo -- depending on the name -- and  
24 Mr. Bonilla, and so I wanted statements that were  
25 being made to reflect the reality of what we were

1 Virginia seeking injunctive relief to fix these voter  
2 rolls and to fix publication of data that led to this  
3 problem in the first place.

4 And so I'm referring to an effort to do that  
5 which the plaintiffs' firms have never done, and  
6 that's actually get to the root cause of this  
7 problem, which is canceling citizens and publishing  
8 information declaring them noncitizens. That's on  
9 the face of the pleadings in this case.

10 Q. And the court ruled that Defendants'  
11 attempt to implead the Virginia Department of  
12 Elections in this case was improper, correct?

13 MR. LOCKERBY: Well, object to the form of  
14 the question. The ruling speaks for itself.

15 MR. TEPE: Well, if the witness can talk  
16 about it, then I can talk about it as well.

17 MR. LOCKERBY: The Court ruled what it  
18 ruled, and the witness's testimony and your questions  
19 don't change the Court's ruling.

20 MR. TEPE: Right, and so I provided an  
21 accurate statement with regard to the Court's ruling.

22 MR. LOCKERBY: Well, actually you didn't.

23 MR. TEPE: The Court ruled that it was  
24 improper of Defendants to implead the Virginia  
25 Department of Elections in this case, correct?

MR. LOCKERBY: I'm not here to answer questions. I'm objecting.

Q. That is correct, Mr. Adams, right?

A. I don't think it is actually. I think that -- and it's notable that nobody else has made any effort in the intervening time, particularly Plaintiffs' law firms, to fix this. They were more interested in defendants than they are the problem.

And so the court ruled, and, again, you're testing my limits of understanding interpleader, that it was not an action for damages, and, therefore, not subject to the particular rule permitting it.

That doesn't mean that the case is improper or didn't have merit and couldn't be later filed by either PILF, or, incidentally, your clients could file that case too, but they haven't, or your firm could or your many public interest interests that you're associating with here could have filed that case, but only we did. And we have the right to do that and so do you, but you haven't.

Q. Well, you filed that case to shift the blame for what you've been sued about, which is defamation and voter intimidation, correct?

MR. LOCKERBY: Object to the form.

A. We filed that case because it's wrong for

the Commonwealth of Virginia to remove citizens from the voter rolls and then label them as noncitizens, and that's exactly what the Commonwealth did.

You, on the other hand, are more interested in the Defendants than the underlying problem, and that's why you haven't done what we did. It wasn't to shift blame, because blame only lies in one place, and that's the Commonwealth of Virginia, for canceling noncitizens they should not be canceling and for calling them declared noncitizens when they don't have a basis for doing so.

When we learned what was happening, we took action, you didn't, and none of your funders or your organizations did. We're the ones who have been trying to fix this problem; you haven't.

We would happily resolve this to fix the problem, but that's not what you're interested in. You're interested in the Defendants. You're not interested in the problem. It's not shifting blame.

Q. In the Safe Spaces -- excuse me. Pardon me. In the Safe Spaces report PILF does not list the names, the full names and addresses of people in the records that were collected by PILF, correct?

A. I don't know. There could have been some attachment I'm not aware of. If you have one that

the names and addresses are listed, I'm happy to look at it. You haven't handed me, as you have in other exhibits, reports throughout my two depositions the exhibits. You've just handed me --

When I say "exhibits," I mean the links to Exhibit 41. You've only handed me the underlying document. You haven't handed me the exhibit links, but you did with Alien Invasion I or II. So there may be something there that would change my answer to what I just said.

Q. So like on page 14 of the final Safe Spaces report, Bates number 7763 --

A. I'm looking at 7763 in Adams 41.

Q. -- there's a copy of a San Diego County voter registration form; is that right?

A. Right. It appears to be San Diego County.

Q. And part of the individual's name is redacted, and the individual's residence is redacted; is that right?

A. In this particular document that is correct.

Q. You can put that document aside.

A. And just to clarify my last answer, otherwise, when I said "this particular document," I meant on that particular page of the document.

Q. Who is Chris Marston?

A. He is an acquaintance of mine.

Q. How is he an acquaintance of yours?

A. I've fed his dogs. I've been to his house. I've had lunch with him. He's a friend.

Q. Is he also affiliated with the Republican Party of Virginia?

A. I don't know if he is right now.

Q. Back in 2016-2017?

A. I think at times he has been general counsel to the Republican Party of Virginia.

Q. You coordinated the collection of election records for the Alien Invasion reports with the Republican Party of Virginia; is that right?

A. No.

MR. LOCKERBY: Object to the form of the question.

A. Not close to right.

(Johnson Exhibit 33

previously marked for identification

and referenced herein: Email

correspondence from (topmost) N

Johnson sent 11/16/2016

PILF-ADAMS-0009399)

Q. I've handed the witness what has been

1 previously marked as Johnson 33. Do you recognize  
2 this document?

3 A. I see Johnson 33.

4 Q. It begins with an email from Shawna Powell  
5 to Noel Johnson dated November 16th, 2016. Do you  
6 see that?

7 A. It does start, but I'm not on that thread.  
8 I said it does start that way, but I'm not on that  
9 thread.

10 Q. Okay. Oh, I'm sorry, I thought you were  
11 just asking for time to catch up looking at the  
12 document.

13 Yes. Well, you were forwarded that thread,  
14 but we'll get to there in a minute.

15 Ms. Powell wrote to Mr. Johnson a note saying:

16 "Stafford called 11-16 to f/u on the  
17 email sent 11-15. Greg Riddlemoser  
18 stated that RPV (Republican Party of  
19 Virginia) came to his office and  
20 went through all the records, so he  
21 considers this matter done. I  
22 explained we are not working with  
23 RPV; however, he stated that, quote,  
24 they, closed quote, said we are  
25 working with them. If we want to

1 send someone to the office to go  
2 through the records, we're more than  
3 welcome."

4 Do you see that note from Ms. Powell?

5 A. I see it. I don't agree with it, but I  
6 see it.

7 Q. And then Mr. Johnson forwards this email  
8 to you, but before I get into that, Stafford -- this  
9 is Stafford County Election Office; is that right?

10 A. I can't imagine it being anything else.

11 Q. Okay. Mr. Johnson says, "We are in the  
12 process of getting registration applications for the  
13 remaining counties in Virginia. Any reasons RPV  
14 would have asked for the same records?" Do you see  
15 that question posed to you?

16 A. I see that question.

17 Q. Okay. And then you responded, same day,  
18 November 16, 2016, "yes, I suggested it. I believe  
19 swarming is better than lone attacks. That's how the  
20 left plays." Do you see that?

21 A. I do.

22 Q. And so you were saying that you suggested  
23 that the RPV, the Republican Party of Virginia,  
24 requests the same records that you were seeking from  
25 Virginia counties.

1 A. Well, that's what it says, and it would be  
2 consistent with what I would do, because if somebody  
3 else asked for the same records, it would help  
4 dislodge the records that we weren't getting, but I  
5 don't have a specific recollection of suggesting it.

6 Q. You have no reason to doubt that you had  
7 suggested it?

8 A. Well, the "it" being the operative thing.  
9 If it's confined to sending a letter asking for the  
10 same records, I -- my testimony that I just gave you  
11 was I would have seen utility in something like that  
12 as being more likely to dislodge what we were looking  
13 for and not getting from election officials.

14 Q. So you suggested that the Republican Party  
15 of Virginia request the same records that PILF was  
16 requesting to dislodge those records for the Alien  
17 Invasion reports, correct?

18 A. Well, you're asking me whether I have a  
19 recollection of suggesting it, and I've testified  
20 about that twice. And my testimony is I don't  
21 remember specifically doing that, but it would be  
22 consistent with the corporate purposes of PILF.

23 Q. To coordinate with the Republican Party of  
24 Virginia?

25 MR. LOCKERBY: Objection to form.

1 A. Absolutely not. Why would you even say  
2 something like that? I just testified to what I  
3 meant. What I said was dislodging the records would  
4 be consistent with the corporate policies of PILF.

5 Q. Right. So you had suggested the  
6 Republican Party of Virginia ask the same records  
7 that you were seeking at least as of -- from Stafford  
8 County -- to dislodge records that you wanted; is  
9 that right?

10 A. I've testified to you now this is the  
11 fourth time. I don't have a specific recollection of  
12 doing that, but it would be consistent with the  
13 corporate purposes of PILF to get records. So I'm  
14 not disputing that it occurred.

15 Q. And in your email here you say that you  
16 had suggested it, right?

17 A. Right, and I'm telling you I don't  
18 remember the specifics of that.

19 Q. And you have no doubt that this occurred,  
20 that you had suggested to the Republican Party of  
21 Virginia seeking the same records that PILF was  
22 seeking.

23 A. Well, if I had a specific recollection  
24 about the suggestion, then I would be able to answer  
25 your question yes. Because I don't have a specific

1 recollection of it, I can't answer your question  
2 utterly conclusively. It would be consistent with  
3 the corporate purposes of PILF to do that which would  
4 enable the records to be given to us that we asked  
5 for.

6 Q. You can put that document aside.

7 Chris Marston and the Republican Party of  
8 Virginia appeared as amici in support of PILF's  
9 lawsuits against Chesterfield and Manassas; is that  
10 correct?

11 A. They did.

12 Q. And is that also consistent with the  
13 corporate purposes of PILF?

14 A. One of the corporate purposes of PILF is  
15 transparency in election records and compliance with  
16 federal law relating to transparency guarantees, and  
17 apparently the Republican Party of Virginia shares  
18 our values in relation to election records being  
19 transparent and jurisdictions within the Commonwealth  
20 of Virginia complying with federal law relating to  
21 that transparency.

22 Q. Have you ever suggested to Mr. Marston how  
23 the Republican Party of Virginia could be impacted by  
24 the requests that you were seeking?

25 A. I don't understand the question.

1 Q. Well, you were seeking information for  
2 PILF's own purposes, correct, from the Virginia  
3 jurisdictions?

4 A. "Seeking information for ..." We had made  
5 records requests of these jurisdictions that they  
6 were not complying with, and so, yes, we were seeking  
7 those records.

8 Q. And in seeking those records did you ever  
9 opine on how those records could be useful to the  
10 Republican party of Virginia?

11 A. I don't think I would have cared, at least  
12 not in my individual capacity or corporate. I don't  
13 think that's what mattered to me. My -- my interest  
14 was in getting the records, and I knew multiple  
15 people knocking on the same door asking for the same  
16 thing would make it much more likely to have those  
17 records produced. And it was purely a case of  
18 self-interest by PILF, or largely, if not entirely, a  
19 case of self-interest by PILF, to have as many people  
20 as possible asking for those records.

21 (VVA Exhibit 35 previously  
22 marked for identification and  
23 referenced herein: Email  
24 correspondence from (topmost) C  
25 Adams sent 12/1/2016

1 PILF-ADAMS-0043845 - 0043848)

2 Q. I'm handing the witness a document that's  
3 been previously marked as VVA Exhibit 35 with the  
4 Bates number 43845.

5 Do you recognize this, Mr. Adams?

6 A. This looks like some kind of conference  
7 call setup for some kind -- it says webinar,  
8 something related to a webinar.

9 Q. Does it look to be a invitation sent from  
10 Mr. George with an agenda that was included on your  
11 calendar?

12 A. I'm sorry. It was included on my  
13 calendar? No.

14 Q. There's a "start" and "end" notation at  
15 the top, "show time as busy." Those are Outlook  
16 entry characteristics, correct?

17 A. Well, it doesn't make sense to me, but ...  
18 I mean, I have a recollection of this event.

19 Q. You do.

20 A. Yes.

21 Q. Okay. So Mr. George was setting up a  
22 webinar or a conference call?

23 A. No, it was a webinar.

24 Q. Okay. And his email is dated November  
25 30th, 2016?

1 A. November 30th ... yes.

2 Q. And there's an agenda that follows; is  
3 that right?

4 A. It says "Agenda" on it.

5 Q. Before we get to the agenda, actually so  
6 Mr. Adams -- excuse me -- Mr. George sent this to  
7 you, correct? Michael J. O'Neill.

8 A. Right.

9 Q. And he's with Landmark Legal; is that  
10 right?

11 A. I don't know.

12 Q. You don't know?

13 A. Michael O'Neill -- there's somebody named  
14 Michael there, I think, it may -- maybe O'Neill, but  
15 it's not someone I talk to very much, if at all.

16 Q. Clara Belle Wheeler is on this?

17 A. It says that.

18 Q. Yeah. Keith Damon?

19 A. The document says that.

20 Q. Craig DiSesa, Nancy Smith?

21 A. It says all that.

22 Q. Now Mr. DiSesa and Ms. Smith are with the  
23 Political Action Committee called Middle Resolution,  
24 correct?

25 A. I don't know. Does the document say that?

1 I mean, I don't know.

2 Q. Well, you do know that Middle Resolution  
3 helped with data analysis for the Alien Invasion  
4 reports, correct?

5 A. I do now. I didn't then.

6 Q. Who is Chris Wright?

7 A. I have no earthly idea.

8 Q. And do you see --

9 A. Right as I sit here, I mean, I couldn't  
10 tell you who that is. I don't know.

11 Q. Chris Marston is on this email chain as  
12 well?

13 A. That's what it says.

14 Q. Okay. And you provided a report for this  
15 webinar; is that right?

16 A. I don't know.

17 Q. Well, you said --

18 A. I remember talking about it, but -- when  
19 you say "a report," I assumed you meant some sort of  
20 written document for the webinar. I suspect you may  
21 have meant something else now.

22 Q. Well, what do you recall from this event?

23 A. Okay. I recall almost nothing about what  
24 anybody said. I have some recollection, because I  
25 think I went first, I got off the call as fast as

1 possible. I remember that. I know that I didn't  
2 stick around for the whole show. I remember that.

3 I recall talking in generalities about the  
4 sort of issues going on in the Commonwealth and  
5 noncitizen registration voting. And I recall that it  
6 was at night or later in the day, that it was close  
7 to being dark outside, and being thankful that I was  
8 not on for the whole call. That's what I recall  
9 about it.

10 Q. And according to the agenda, there's an  
11 agenda line for legislative possibilities for  
12 Virginia's 2017 General Assembly.

13 A. Where is that? Right, it says that. I  
14 don't think that was one of my topics, but ...

15 Q. And then election lawsuit -- election law  
16 lawsuits current and planned, and there seems to be a  
17 bullet with your name underneath that.

18 A. Yep.

19 Q. And then there seems to be maybe some  
20 bullets with respect to Landmark Legal Foundation.

21 A. Really? Where? I don't see those.

22 Q. The next page.

23 A. Oh, right, okay. Hmm ...

24 Q. And then there's a bullet RPV (Ed  
25 Gillespie)?

1 A. That's what the document says.

2 Q. Do you know what that's with regard to?

3 A. No, because I hung up on the call. I  
4 didn't participate after I was done.

5 Q. Okay. And there's another bullet with  
6 Virginia Voters Alliance?

7 A. The document says that.

8 Q. What was the purpose of this call?

9 A. Well, I can tell you what my purpose was.

10 Q. What was your purpose?

11 A. My purpose was to grant Reagan's request  
12 that I talk to his webinar and be out of the call as  
13 quickly as possible with minimal amount of imposition  
14 on my time, and my purpose was to hang up as quickly  
15 as possible after I satisfied that initial purpose.

16 Q. Who is John Mashburn?

17 A. Where does it say John Mashburn?

18 Q. You can put that document aside.

19 A. Oh. You're not asking me about this  
20 document.

21 Q. No.

22 A. Okay.

23 Q. Do you know a John Mashburn?

24 A. I do.

25 Q. Who is he?

1 A. He's an individual. He's an attorney.

2 What else do you want to know?

3 Q. Was he a member of the Trump campaign in  
4 September of 2016?

5 A. Probably, but I can't say with absolute  
6 certainty. If you had a document to refresh my  
7 recollection, I could answer with greater precision.

8 (Adams Exhibit 42 marked for  
9 identification: Email correspondence  
10 from (topmost) C Adams sent 9/8/2016  
11 PILF-ADAMS-0039730)

12 Q. The court reporter has marked and handed  
13 to you what's been marked as Exhibit 42 with Bates  
14 number beginning 39730. Do you recognize this email?

15 A. Not yet. Okay. I see the email.

16 Q. It's an email from you dated September  
17 8th, 2016 to John Mashburn?

18 A. That's what the email says.

19 Q. Okay. Do you recall this email?

20 A. Not with a high degree of effectiveness,  
21 but ...

22 Q. You don't doubt you sent it?

23 A. Oh, no, not -- if you're producing this to  
24 me and representing it as an email I sent, I'm not  
25 going to think that you would sink to such low depths



1 to give me a fraudulent email. So, no, I have no  
2 doubt that you have said it.

3 Q. It certainly came from your production.

4 A. So ...

5 Q. The subject line is "Hans' latest:  
6 Virginia aliens on rolls -- thousands." That's the  
7 subject line.

8 A. That's what it says.

9 Q. And it appears to be an excerpt, and then  
10 linked to -- an excerpt of and linked to something  
11 Mr. von Spakovsky wrote; is that right?

12 A. Well, it says "Hans' latest," and that  
13 would be the sort of thing I would say if I was  
14 sending something to somebody with an article that  
15 Hans wrote. So I have no reason to disagree.

16 Q. Do you know why you sent this to  
17 Mr. Mashburn?

18 A. Probably because I liked his article.

19 Q. Hans' article.

20 A. Right.

21 Q. But why would you send it to John  
22 Mashburn?

23 A. Because we have a long history working  
24 together on these issues.

25 Q. What's that history?

1 A. Well, he worked -- he worked on a number  
2 of cases with me in this area.

3 Q. What cases?

4 A. ACUR vs. Zavala County, Texas. There's a  
5 case.

6 Q. And he was part of the Trump campaign at  
7 this time?

8 A. I don't know. You've asked me that, and  
9 this email doesn't refresh my recollection as to --  
10 obviously I didn't send it to a Trump email address,  
11 so there is the possibility that he wasn't. Had this  
12 been sent to JohnMashburn@TrumpPresidentialCampaign  
13 dot whatever, then that would be conclusive that he  
14 was a member of the Trump presidential campaign. I  
15 just don't know.

16 Q. You can put that document aside.

17 A. All right.

18 Q. In November of 2016 you responded to an  
19 email from Stephen Miller at his Trump campaign email  
20 address and sent him Alien Invasion I, correct?

21 A. If you have that document to refresh my  
22 recollection. I would take issue potentially with  
23 some of your characterization, but I'm sure the  
24 document would refresh my recollection. I don't  
25 remember.

1 Q. Okay. But what from my question would you  
2 take issue with?

3 A. Well, I don't remember.

4 Q. Okay.

5 A. You asked me a question. I don't remember  
6 the answer.

7 Q. I just wasn't sure if you were taking  
8 issue with the characterization.

9 (Adams Exhibit 43 marked for  
10 identification: Email correspondence  
11 from (topmost) C Adams sent  
12 11/26/2016 with attachment  
13 PILF-ADAMS-0039499 - 0039680)

14 Q. I've handed you what's been marked as  
15 Exhibit 43 with the beginning Bates number 39499.

16 A. Okay. I have the document.

17 Q. Do you recall receiving this email from  
18 Stephen Miller on November 25th, 2016?

19 A. I do.

20 Q. Do you know why he emailed you?

21 A. On this particular date?

22 Q. Correct.

23 A. I think I knew at the time. It has  
24 something to do with the context of this particular  
25 email this date, but I don't remember sitting here

1 today.

2 There was some context, and it might have been  
3 the day after Thanksgiving, and something might have  
4 been in the news, but that's the best I can remember  
5 sitting here.

6 Q. His email is very short. Subject line,  
7 "Vote Fraud," the body says, "can you send some info  
8 on noncitizen voting."

9 A. That's what it says.

10 Q. And then you respond on Saturday, November  
11 26th, with two documents attached, right?

12 A. Well, I disagree with your  
13 characterization, because it doesn't make sense that  
14 I would have sent the declared noncitizen lists.

15 Q. I'm not sure I understand.

16 A. Well --

17 Q. I said and you responded on Saturday,  
18 November 26th with two documents attached. What's --  
19 what's there to disagree with?

20 A. Well, I think your inclusion of a variety  
21 of pages to Exhibit 43 were not part of what I would  
22 have sent him.

23 Q. Okay. We're not even there.

24 A. Well, you asked me about the attachments,  
25 and I'm answering you.

1 Q. Okay. So my question was, you attached  
2 two documents. Yes or no.

3 A. Two documents are reflected in the  
4 attachment line, but this exhibit you've handed me  
5 has more than two documents in it. That's my point.

6 Q. Okay. Let's take it one step at a time.  
7 You say two documents attached, number one, Alien  
8 Invasion report for Virginia, correct?

9 A. It says that in the attachment. Well, it  
10 doesn't. It says --

11 Q. In the body --

12 A. Right, right, in the body of the email,  
13 Alien Invasion report for VA.

14 Q. And then the second document attached,  
15 according to your cover email, is pleading in the  
16 EAC/Kobach/PILF litigation, right?

17 A. That's what it says.

18 Q. Okay. You also said, with respect to the  
19 Alien Invasion report attachment, you said, "We found  
20 over one thousand aliens --"

21 "We found over one thousand aliens were on the  
22 rolls in just eight Virginia counties," right?

23 A. That's accurate.

24 Q. Okay. And then the attachment of the  
25 Alien Invasion report begins on page Bates 39500,

1 right, which is --

2 A. 39 ...

3 Q. So the email, which I gave you, is Bates  
4 number 39499. Do you see that?

5 A. Right.

6 Q. And then the attachment begins on Bates  
7 number 39500. Do you see that?

8 A. Yeah.

9 Q. And it contains the entire Alien Invasion  
10 I report with exhibits, correct?

11 A. Mistakenly, I think. I think whoever  
12 prepared Adams 43 included documents that were not  
13 part of the email to Miller.

14 Q. Well, I don't know why you'd say that,  
15 because the attachment, which was produced by you,  
16 because this is coming from you at your electionlaw  
17 center.com address and doesn't copy anyone from  
18 PILF --

19 MR. LOCKERBY: We'll stipulate that these  
20 were produced by the Defendants with the Bates  
21 numbers indicated.

22 We're bumping up against seven hours, so I  
23 think that's in everyone's interest.

24 Q. Right. So this is 39500 through 39642.  
25 That's this single attachment, right?

1 A. On Exhibit 43 there's a pile of paper that  
2 includes what you just described that I have a  
3 recollection of never sending to Stephen Miller.

4 Q. Well --

5 A. I would not have sent this to him.

6 Q. Well, this is the attachment.

7 A. Then it's mistaken. This is a mistaken  
8 document that includes information that I never sent  
9 to Stephen Miller, to the best of my recollection  
10 sitting here.

11 Q. Okay. Well, this is what, as Mr. Lockerby  
12 said, Defendants --

13 A. I know. And I'm just trying to flag this  
14 as my recollection of that email, and I can't account  
15 for the fact that there's a pile of paper here that I  
16 do not believe were ever part of my email to Stephen  
17 Miller.

18 Now I could be mistaken about this, but it  
19 would not be consistent with how I would have  
20 attempted to economize his attention by sending him  
21 hundreds of pages. And I believe I had a -- I don't  
22 have anything else.

23 Q. And since this includes, at least this  
24 attachment includes the entire Alien Invasion I  
25 report with exhibits, it includes the name and

1 address of Luciania Freeman, correct?

2 A. Well, you're going to double-down. I'm  
3 telling you I don't think that I included this  
4 attachment in my email to Stephen Miller. And I will  
5 readily admit that probably in the pile of paper  
6 known as Adams 43 the name of -- which Plaintiff did  
7 you ask me about, Miller?

8 Q. Luciania Freeman.

9 A. Freeman? It's probably in there in the  
10 pile of paper in Adams 43. What I'm trying to  
11 emphasize to you is I do not believe that this was  
12 sent in this email as an attachment.

13 Q. Prior to this email outreach by  
14 Mr. Miller, have you talked to him before?

15 A. I believe so.

16 Q. And I think your testimony was you don't  
17 recall why he was reaching out to you; is that right?

18 A. Well, I know there is a context --

19 Q. But you're not thinking of it right now.

20 A. -- but I can't remember what it is right  
21 now.

22 Q. What was the purpose of sending him the  
23 Alien Invasion report in response to his email, do  
24 you recall?

25 A. Well, I discuss that. I said, here's a

<p style="text-align: right;">Page 290</p> <p>1 start. He wants information on noncitizen voting, 2 and there is no question that there are noncitizens 3 that are referred to in the Alien I who were voting 4 in the Commonwealth of Virginia. 5 Q. But Luciania Freeman is not one of them, 6 correct? 7 A. Well, I have, on multiple occasions, I 8 believe, told you that I understand that Mr. Bonilla, 9 Ms. Freeman are citizens, and I feel bad that they 10 were identified otherwise by the Commonwealth of 11 Virginia and that their registrations were improperly 12 canceled. And that's precisely why we wanted to do 13 something about it by bringing an action against the 14 Commonwealth. 15 Q. Am I correct that you wanted to publish 16 Alien Invasion II in May of 2017 to piggyback on 17 Trump's announcement of the Voter Fraud Commission? 18 A. No. Why? Do you have a basis for that? 19 MR. LOCKERBY: Before we proceed, can we 20 see where we are in terms of time? 21 VIDEO SPECIALIST: A little less than 22 three minutes. 23 MR. TEPE: Until my next hour? 24 (Adams Exhibit 44 marked for 25 identification: Email correspondence</p>	<p style="text-align: right;">Page 291</p> <p>1 from (topmost) R George sent 2 5/17/2017 3 PILF-ADAMS-0013078 - 0013079) 4 MR. TEPE: Let the record reflect that the 5 witness has been handed an exhibit marked number 44 6 with Bates number 13078. 7 Q. I'll direct your attention to the bottom 8 email sent by Reagan George May 17th, 2017. Do you 9 see that? 10 A. It's -- there's an email from Reagan on 11 May 17th, 2017. 12 Q. And it's to Steve and Nancy with Middle 13 Resolution? 14 A. I have no idea. 15 Q. It says, "Steve/Nancy, just checking. 16 Christian is wanting to get their article written 17 ASAP to piggyback on Trump's announcement of the 18 Voter Fraud Commission." Do you see that? 19 A. I don't know what article he's referring 20 to. 21 Q. Well, he's referring to Alien Invasion II, 22 correct? 23 MR. LOCKERBY: Object to form. 24 A. How do you know that? 25 Q. Because Nancy Smith and Steve Mond, who</p>
<p style="text-align: right;">Page 292</p> <p>1 Mr. George emailed, provide data analysis that was 2 used in the Alien Invasion II report. 3 A. Yeah, and Reagan appears to be way off 4 here. A, he refers to an article; B, he refers to a 5 fictional reason to write the article. Doesn't 6 appear to have any basis. 7 Q. And so the subject line of this email was 8 "Any feedback on the noncitizens voter history list?" 9 Right? 10 A. Well, that's the subject in an email from 11 Steve Mond it looks like. 12 Q. Right. And then Mr. George responds, "We 13 are looking for the maximum number of votes cast so 14 go as far back as the oldest registration on the 15 list." Do you see that? 16 A. That's what the email says. 17 Q. And then he, Steve, responds, "should be 18 done by Friday at the latest," right? 19 A. That's what the email says. 20 Q. And then Reagan George responds by saying, 21 "Thanks Steve for all your hard work on this," and 22 you are copied on that email, correct? 23 A. At last I am copied on that last email. 24 Q. Did you email Reagan George and tell him 25 that he was completely off basis in his</p>	<p style="text-align: right;">Page 293</p> <p>1 characterization? 2 A. I'm not sure I ever read this email, but I 3 will be happy to tell him now. 4 VIDEO SPECIALIST: Excuse me. That's 5 seven hours. 6 MR. LOCKERBY: All right. So we're done. 7 VIDEO SPECIALIST: We're not off the 8 record yet. Should we go off? 9 MR. TEPE: If we must. 10 MR. LOCKERBY: We must. Don't want to 11 violate any rules. 12 VIDEO SPECIALIST: We are off the record, 13 5:48. 14 MR. TEPE: Take a break? I assume you got 15 nothin', right? 16 MR. LOCKERBY: I have no questions. 17 MR. TEPE: You have no questions? 18 MR. LOCKERBY: I have no questions. 19 MR. TEPE: So we're done. 20 MR. LOCKERBY: We're done. You mean put 21 on the record that I have no questions? 22 MR. TEPE: Yes. 23 MR. LOCKERBY: We can do that. 24 VIDEO SPECIALIST: Give me one second. 25 We are back on the record, 5:49</p>

MR. LOCKERBY: I have no questions. And he will read and sign.

MR. TEPE: Thank you.

MR. LOCKERBY: You're welcome.

VIDEO SPECIALIST: We are off the record, 5:49.

//

(The deposition of J. CHRISTIAN ADAMS adjourned at 5:49 p.m.)

//

# ACKNOWLEDGMENT OF DEPONENT

I, J. CHRISTIAN ADAMS, do hereby acknowledge that I have read and examined the foregoing testimony and that the same is a true, correct and complete transcription of the testimony given by me, with the exception of the noted corrections, if any, appearing on the attached errata page(s).

DATE J. CHRISTIAN ADAMS

Subscribed and sworn to before me this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_(Notary Public)

My Commission expires: \_\_\_\_\_

[SEAL]

# CERTIFICATE

I, LINDA S. KINKADE, Registered Diplomat Reporter, Certified Realtime Reporter, Registered Merit Reporter, Certified Shorthand Reporter, and Notary Public, do hereby certify that prior to the commencement of examination the deponent herein was duly sworn by me to testify truthfully under penalty of perjury.

I FURTHER CERTIFY that the foregoing is a true and accurate transcript of the proceedings as reported by me stenographically to the best of my ability.

I FURTHER CERTIFY that I am neither counsel for nor related to nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 2nd day of May, 2019.

My commission expires: July 31, 2022

LINDA S. KINKADE  
THE DISTRICT OF COLUMBIA

# EXHIBITS

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ERRATA SHEET

Case Name:

Deposition Date:

Deponent:

Pg. No. Now Reads Should Read Reason

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Signature of Deponent

SUBSCRIBED AND SWORN BEFORE ME

THIS \_\_\_\_ DAY OF \_\_\_\_\_, 2019.

\_\_\_\_\_  
(Notary Public) MY COMMISSION EXPIRES: \_\_\_\_\_

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